

Lender Insurance Guide

January 18, 2007

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1. Introduction

1.1. Purpose of this Guide

On January 1, 2006, the Department of Housing and Urban Development (HUD), Federal Housing Administration's (FHA's) Office of Single Family Program Development implemented Lender Insurance (LI), a new way of insuring loans that is available to approved lenders. Because LI significantly changes the method of applying for and approving insurance applications, FHA Single Family has provided this guide to assist Lenders, Homeownership Center (HOC) staff, and contractors who participate in the pre-insurance review, post endorsement technical review, and appraisal review processes.

1.2. Guide Organization

Lenders, HOC staff and contractors all participate in the LI function, and each of them have different roles and responsibilities. This Guide is organized first by participant group (Lenders and HOC staff or contractors) then by major process area. This way, lenders can easily refer to the Chapter that pertains to their process activities, and HOC staff and contractors can refer to the Chapter that addresses their responsibilities. Chapters are organized into sections addressing each process.

Because the implementation of LI is supported by changes to **FHA Connection** (**FHAC**), the **Underwriting Report System** (**URS**) and the **Appraisal Review Report** (**ARR**) System, descriptions of these systems and instructions for their use are also included in this Guide. In connection with FHA systems, the following narrative conventions are used:

- ✓ System Names will be in **Bold** (**FHAC**, **URS**, **ARP**)
- ✓ System screens will be referred to in *Italics* as *Pages* and will be identified by their *Page* title
- ✓ Fields are identified in "quotations"
- ✓ When the user is required to enter data into a "field" the data to be entered is enclosed in [brackets]. The option a user selects from a drop-down list also will be enclosed in [brackets].
- ✓ Links to non-**FHAC** system pages are identified in Arial font



1.3. Additional LI Resources

Because the LI function is new, FHA-SF managers and the LI Project team established a variety of resources to assist new participants with the required processes. The following documents and information are available on HUD's Web site:

- ✓ Mortgagee Letter (ML) 2005-36 "Lender Insurance Program" (www.hudclips.org, under 2005 Mortgagee Letters)
- ✓ *LI Developer's Guide* (for those lenders submitting electronic case binders (eCBs) (http://www.hud.gov/pub/chums/electronicCaseBinder.pdf).
- ✓ "CHUMS Processing Instructions" (available to HUD staff and HUD contractors only) (http://hudatwork.hud.gov/po/h/hs/sys/chums/chumsf17.cfm)
- ✓ Neighborhood Watch (https://entp.hud.gov/sfnw/nw/).
- ✓ A new Lender Insurance Home Page (http://www.hud.gov/offices/hsg/sfh/lender/lendins.cfm) This resource provides a description of the LI Program and has links to the references listed above.

1.4. FHA-SF HOC Contact List

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FHA-SF's four HOCs administer the LI function and provide technical assistance to participants. To obtain information about LI, interested lenders should contact the FHA Resource Center by phone at 1-800-225-5342 or by e:mail at hud@custhelp.com.



The Lender Insurance Program

1.5. Program Overview

The primary purpose of the LI program is to streamline and simplify FHA's insurance process. LI permits high-performing lenders to insure FHA loans without a HOC preinsurance review. Instead, the lender performs its own pre-insurance review using personnel that neither originated nor underwrote the mortgage. The lender then submits loan-level data to FHA via **FHAC** or **B2G**. **FHAC/B2G** performs an automated verification process to check the data for accuracy and completeness. Loans passing the edits are insured automatically.

The only time LI lenders will have to submit a case binder (CB) to a HOC prior to obtaining FHA mortgage insurance will be if the automated verification process results in a "Severe Case Warning" indicating risk to FHA. Since the HOCs review the CBs prior to insurance only on an exception basis, the Notice of Return (NOR) process with its accompanying CB resubmission requirements is dramatically reduced.

FHA still selects a sample of loans for post-endorsement technical review (PETR) and appraisal review. Lenders must submit either paper or electronic CBs in response to FHA's request for review within ten business days. CBs requested by FHA for pre-insurance exception processing due to Severe Case Warnings, post-endorsement review, or appraiser review continue to fall under the jurisdiction of the appropriate HOCs.

Once a lender begins participating in LI, it must process <u>all</u> loans it originates or underwrites using LI. All pipeline loans must be reviewed and insured by the lender using the LI insurance process. Lenders may submit requested CBs in paper or electronic format. However, once a lender is approved to submit case binders in an electronic format (eCB), all <u>loans</u> must be submitted to HUD in an electronic format. This new process makes it easier for lenders to do business with FHA and is more cost-effective for all participants.

The regulations governing Lender Insurance are pursuant to Section 256 of the National Housing Act and were published in the Code of Federal Regulations at 24 CFR §\$203.4, 203.6, and 203.255(f) on June 2, 1997. On September 23, 2005, FHA issued

¹ Mortgagee Letter 2005-36 lists the requirements for the pre-insurance review. Appendix A is a checklist LI lenders can use during this process.



Mortgagee Letter 2005-36 "Lender Insurance Program," which provides detailed program requirements (Appendix C).

1.6. Eligible Lenders

Lenders meeting the following criteria are eligible to participate in the LI Program:

- ✓ Be an unconditionally approved Direct Endorsement (DE) Mortgagee.
- ✓ Have a 2 years' current default/claim rate at or below 150% of:
 - the *national* average rate for all insured mortgages for national lenders or
 - the *state* average rate for insured mortgages for lenders operating in a single state.

The current default/claim rate is derived at the corporate level of the lender. The rate is calculated based on the lender underwriting the loan. If there is more than one lender on the loan (for example, an originator plus a sponsor or agent), the rate of the sponsor or agent is used. For DE mortgagees that underwrite as sponsors for FHA-approved loan correspondents, the default and claim rate is the aggregate of both retail originations and mortgages underwritten for their loan correspondents. Since lenders are approved at the corporate level, any lending branch within an approved corporation can participate.

Lenders with a pre-closing status or newly released pre-closing status are not eligible for the LI Program.

Approval for the LI Program is effective for one year unless revoked for causes described below. The lender's claim/default rate will be re-evaluated each year on their LI Authorization anniversary date against performance information displayed in **Neighborhood Watch**. If the lender continues to meet LI Program eligibility requirements, its LI status is renewed for another year automatically. If the lender's performance falls below that required for LI, a letter informing the letter that their LI approval is withdraw will be automatically generated. (In the future, the *Insurance Application* Page will display the following message: LI status is withdrawn because the lender no longer meets eligibility requirements) Lenders who may no longer participate in LI will not see the option "Insure Yes/No" on the *Insurance Application* Page.



Additionally, a lender's eligibility to participate in LI may be terminated² at any time if the lender fails to:

- ✓ Adopt and employ a pre-insurance review process.
- ✓ Maintain DE approval at the lender and branch level.
- ✓ Maintain eligibility criteria.
- ✓ Submit requested case binders on time.

Requested CBs must be submitted to the appropriate HOC within ten calendar days of the request date. The LI lender may submit either a paper CB via mail or an electronic CB (see section 2.7). If the lender fails to submit five or more requested case binders within the established timeframe - at one time, the HOC Processing and Underwriting Division (PUD) Director may determine that the lender must be suspended from the LI Program until all CBs have been received by the requesting HOCs. If the lender continues to exhibit a pattern of noncompliance, Processing and Underwriting staff will suspend its LI approval until all five binders are received. Information to lenders on how to apply for the LI Program is presented in Section 3.2 and to HOC staff administering LI lenders in Section 4.9.

1.6.1. Check Eligibility Using Neighborhood Watch

To determine if they are eligible for LI, lenders can access the **Neighborhood Watch/Early Warning System** at https://entp.hud.gov/sfnw/nw/ and follow the steps below:

- Step 1. From the Menu select [Early Warnings] then select [Single Lender] to display the *Early Warnings—Single Lender* Page (Figure 1).
- Step 2. Enter the first few letters of the lender name or the five-digit lender ID into the "Direct Endorsement Lender" field.
- Step 3. Moving from left to right across the Page, select [Direct Endorsement Lender] from the "Mortgagee Selection" box.
- Step 4. Select [Current Defaults] from the "Default Choices" box.
- Step 5. Select the most recent date from the "Performance Period" box.
- Step 6. Drop down to near the bottom of the Page and select [Nationwide Totals] from the "Show Data For" box. (Lenders doing business in just one state should select [State] from the drop down box.

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² Termination provisions for individual lenders are at 24 CFR § 203.4(d).



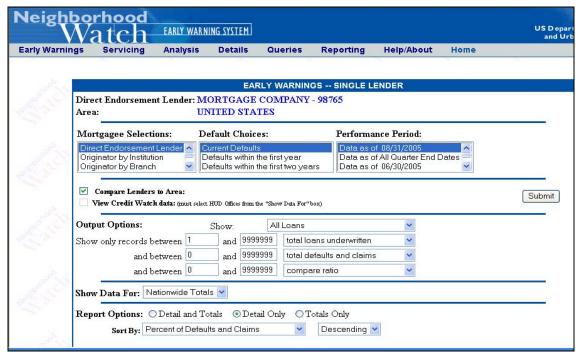


Figure 1. Checking Lender Eligibility in Neighborhood Watch.

Step 7. View the "Total Compare Ratio" (Figure 2). The Compare Ratio for all DE loans—both retail and sponsored—must be $\leq 150\%$.

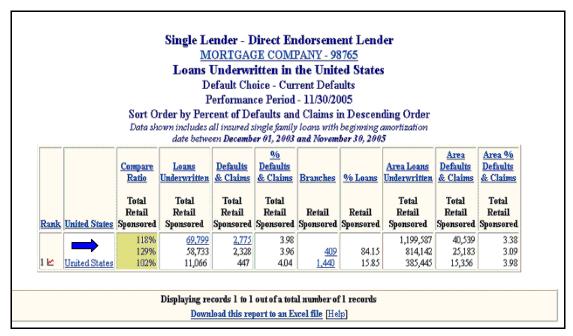


Figure 2. Determining LI Eligibility Using Neighborhood Watch.



1.7. Eligible Loan Products

All FHA-insured forward mortgages are eligible for LI processing and the electronic case binder (eCB) option described in Section 2.7. These include loans under FHA's basic mortgage insurance programs:

- ✓ 203(b): Standard FHA mortgages for detached dwellings
- ✓ 203(h): Mortgages for disaster victims
- ✓ 203(k): Rehabilitation mortgages
- ✓ 234(c): Condominium mortgages
- ✓ 247: Hawaiian Homelands mortgages
- ✓ 248: Mortgages on Indian Reservations and other restricted lands
- ✓ 251: Adjustable rate mortgages, and
- ✓ EEM: Energy Efficient Mortgages

Because original copies of the loan agreements for Home Equity Conversion Mortgages (HECMs) must be signed by FHA officials, these mortgages are not eligible for LI at this time. FHA plans to enhance its systems to enable them to process HECMs in the future. Currently, however, there is no change to the insurance processing for HECM loans and lenders must submit the original paper CBs to the HOCs. That is, **HECMs cannot be endorsed by LI lenders and paper CBs are always required**.

1.8. Endorsing from Data

Under LI, lenders submit loan-level data to FHA—via **FHAC, B2G**, or other means. Once FHA's system receives sufficient data to satisfy it of the legitimacy of the mortgage insurance request, it acknowledges receipt of the lender's data electronically. The submitted loan-level dataset then undergoes a series of FHA program risk-mitigation edits (for example, loan amount and social security number validation, etc.). If the data passes all of these edits, the lender is not required to provide a CB to FHA to obtain insurance. Instead, the system electronically generates a mortgage insurance certificate (eMIC) to serve as evidence that the loan is insured. Lenders who are qualified for and wish to participate in LI must use the LI process for all of their FHA-insured mortgages (with the exception of HECMs).



1.9. Requirements for Submitting Case Binders

1.9.1. Prior to Obtaining FHA Insurance

Since the loans are being insured based upon the data, lenders do not submit CBs to the HOC for pre-insurance processing <u>unless</u> loan-level edit results require them to do so. These results take the form of Severe Case Warnings and occur under the following three conditions:

- 1. A borrower failed or is pending SSN validation,
- 2. A borrower has a record in the **Credit Alert Interactive Voice Response System (CAIVRS)**—indicating a credit sanction), or
- 3. An LI deficiency exists causing risk to FHA. The requesting HOC will add text to the case warning message screen identifying the reason(s) requiring submission of the case binder to the HOC for a pre-endorsement review.

Lenders must submit CBs with CAIVRS or text case warnings, and CBs with SSN validation errors that they attempt to insure to the HOC so FHA staff can conduct a pre-insurance review. These mortgage insurance applications will not be approved until FHA has reviewed the case binder and determined insurance eligibility.

1.9.2. After Obtaining FHA Insurance

The lender's first five requests for insurance under LI will result in a reply from FHA requesting the case binder so that it can be reviewed. Thereafter, after the loan is insured, lenders submit the CB to the HOC only if the loan is selected for a post-endorsement technical review (PETR), appraiser review (ARR), or review/audits. CBs can be requested for review/audit at any time after insurance in support of the following:

- ✓ Congressional requests
- ✓ Freedom of Information Act (FOIA) requests
- ✓ Hotline referrals
- ✓ Program complaints
- ✓ FHA's Quality Assurance Division requests
- ✓ Inspector General (IG) or Government Accountability Office (GAO) requests



FHA requests the CB from the lender by entering the case number on the *Insurance Application* Page. Lenders also may check to see if FHA has requested any CBs by accessing a new **FHAC** Page, *Binder Selection*. Additionally, the *Case Query* Page now provides information on the status of single LI cases.

1.10. Responding to CB Requests

Requested CBs must be submitted to the appropriate HOC within ten business days of the request date. The LI lender may submit either a paper CB via mail or an electronic CB (see section 2.7).

1.10.1 Tracking Requested CBs

LI lenders and HUD personnel can track the status of requested CBs. In **FHAC**, the *Case Query* Page has been modified to display the status of a single case and the *Binder Selection* Page has been added to show the status of multiple CB requests.

1.11. Recap: Four LI Insurance Scenarios

Under LI, once the lender submits the loan data, one of four potential outcomes will occur:

- ✓ <u>LI Eligible/No CB Request</u>: Mortgage is insured and an eMIC is generated. Case is not selected for PETR or Appraisal Review, so there is no CB request.
- ✓ <u>LI Eligible/CB Request</u>: Mortgage is insured and an eMIC is generated. The case is selected for PETR so a CB request is made of the lender via the inclusion of the case number on the *Insurance Application*, *Binder Selection*, or *Case Query* Pages. These Pages also indicate when the CB is received and its processing status.
- ✓ <u>LI Deficient/Lender Can Resolve</u>: Mortgage is not insured because system edits rejected the case (for example, the mortgage amount exceeds the statutory limit). In these cases, warnings display informing the lender of the issues that it must resolve prior to re-submitting the mortgage for insurance. In this situation, the lender must submit the CB to FHA for a pre-insurance review only if it is unable to cure the deficiency and successfully resubmit the insurance data. If upon that second submission, FHA's system accepts the case, the eMIC will be generated. If the lender still cannot cure the reason for the denial, insurance will be withheld until such time as the stated deficiencies are corrected; this may result in the request for the CB for HOC pre-insurance review.



✓ <u>LI Deficient/ Lender Unable to Resolve or Severe Case Warning</u>: Mortgage is not insured because a severe case warning was triggered (for example, a CAIVRS exception) and the lender attempted to insure. The lender must submit the CB to the appropriate HOC for pre-insurance review. Electronic Case Binder Option

Participating LI lenders may choose to submit requested CBs in electronic format. LI approval is a pre-requisite for the electronic CB option. An electronic—or *digitized*--CB is referred to as an "eCB" or "eBinder." The standards for the eCB, as well as the test site for transmittals, can be found in the *Electronic Case Binder Developer's Guide* at http://www.hud.gov/pub/chums/electronicCaseBinder.pdf.

In order to submit an eCB, the lender must have electronic copies of the closing package documentation and produce an extensible Markup Language (XML) file based on the Mortgage Bankers Association's (MBA) Mortgage Industry Standards Maintenance Organization's (MISMO) ePackage SMARTDoc standard.

MISMO was established by the MBA to coordinate the development and maintenance of Internet-based Extensible Markup Language (XML)³ real estate finance specifications. It developed the SMARTDoc, short for Securable, Manageable, Archivable, Retrievable, and Transferable Document)]. A SMARTDoc integrates the data, presentation, business rules, and optionally, the digital signatures to guarantee the authenticity of the document. That is, SMARTDocs combine data only understandable by computers with presentation functionality to display documents as they actually appear in hard copy format. SMARTDocs can be saved and stored by users as if they were any other file.

FHA's preferred imaging standard is a single page TIFF file. TIFF (Tagged Image File Format) is one of the most widely supported industry standard file formats developed for the purpose of storing high-resolution bit-mapped, gray-scale, and color images on

³ XML was designed especially for Web documents, enabling the definition, transmission, validation, and interpretation of data between applications and between organizations.



computers. TIFF files often end with the extension ".tif." FHA will also accept other standard imaging formats including multi-page TIFF and PDF⁴ files.

Lenders must create an automated process to encapsulate each image file into the MISMO Category 4 SMARTDoc, and then combine each SMARTDoc into a single file using the MISMO ePackage Version 1.0 Standard. The details for creating MISMO Smart Documents and a MISMO ePackage can be found at the eMortgage section of the MISMO Web site (http://www.mismo.org/).

The list of documents that are to be included in the eCB and the order in which they must be indexed are included in the *Developer's Guide* located at http://www.hud.gov/pub/chums/electronicCaseBinder.pdf. The list is identical to the documents required for the paper CB.

Once LI lenders decide to submit electronic case binders, they must use electronic case binders for all loans (except HECMS).

After the lender decides to participate in LI with the eCB option, it will undergo a testing phase intended to ensure that it can correctly format and transmit the eCB in the required standard format. The purpose of this quality control measure is to allow FHA staff to make certain that the mortgagee is able to transmit an acceptable digitized case binder for its review. FHA intends to make the submission of eCBs an LI Program requirement once it has had sufficient time to examine the process and determine if any amendments or changes are necessary. High-volume lenders are encouraged to develop an electronic submission capability as soon as possible to take advantage of the substantial time and cost savings associated with paperless LI.

1.12. Record Keeping Requirements

Record keeping requirements do not change. LI lenders (originators and sponsors) must maintain the CB in either hard copy or electronic format for two years from the date the loan was insured. Lenders who choose to send eCBs are not required to maintain the eCB files provided they keep hard copy files. However, they must *submit* eCBs when requested to do so by FHA.

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⁴ PDF is the acronym for *Portable Document Format*, a file format developed by Adobe Systems. PDF captures formatting information from a variety of desktop publishing applications, making it possible to send formatted documents and have them appear on the recipient's monitor or printer as they were intended.



Servicing lenders must maintain the complete case binder for a period of three years beyond the life of the loan.⁵ It is <u>imperative</u> that servicing lenders use due diligence to obtain a complete origination binder for each and every FHA loan they service.

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⁵ Events signifying the end of the "life of the loan" include loan maturity, repayment, refinancing, or foreclosure.



2. LI Lender Processing Requirements

2.1. Overview

From a lender's perspective, the LI function can be broken down into the following major processes:

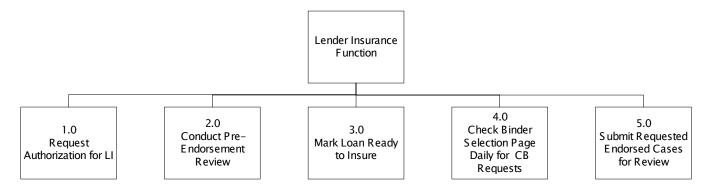


Figure 3. Lender's LI Process Flow.

The FHA systems lenders are accustomed to using when requesting FHA insurance—FHAC or B2G also support LI processing. FHAC users must log on to apply for certification to participate in LI, and will see one new field on the *Insurance Application* Page that they will fill in to indicate they believe the loan complies with all FHA requirements and is ready for endorsement. Additionally, they will be able to view the Binder Selection Page for lists of LI cases that have been endorsed, cases that can not be endorsed without further review of the case binder, and cases that have been requested for Post-Endorsement Technical Review and Appraiser Review. The Case Query Page will show the selection status for an individual case. The same functionality is also available to B2G users.

2.2. Request Authorization for LI

Lenders should not send applications to the HOC to participate in LI. The lender's Application Coordinator completes the application process online following the steps below:



Step 1. Access the *FHA Connection ID Administration Request* Page and select the hypertext link <u>Lender Insurance Acknowledgement</u> (https://entp.hud.gov/idadmin/html/idadmin regmenu.cfm) (Figure 4).

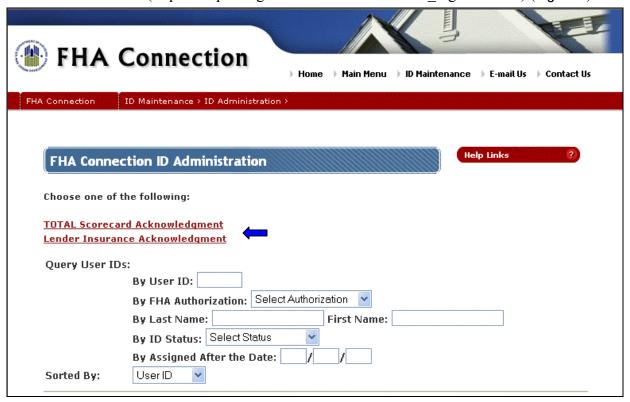


Figure 4. Applying for the LI Program.

The Acknowledgement of Terms and Conditions for Lender Insurance Page displays (Figure 5) and serves both as the application for the LI Program and an acknowledgment of LI's terms and conditions:



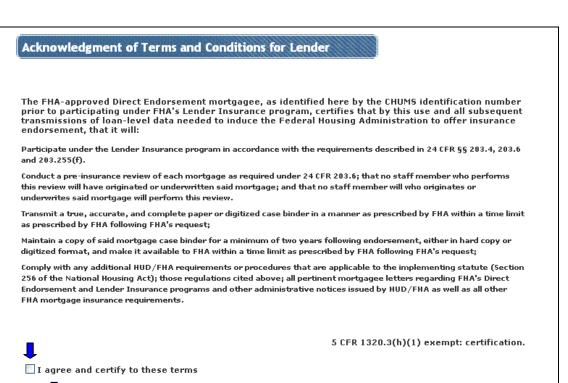


Figure 5. Application for LI Program and Acknowledgement of its Terms and Conditions.

- Step 2. Click the box next to "I Agree and certify to these terms."
- Step 3. Click "Send" to transmit the LI application. The system automatically validates that the lender qualifies for the LI program by checking for two unconditional DE status and acceptable default/claim rate. If the lender is authorized to participate in LI, a "Success" message displays and the lender's LI status is recorded in **CHUMS**. If the lender is not qualified an error message displays.
- Step 4. From the *FHAC ID Maintenance* Page (Figure 6), click the "Insuring Authorization" option in the "Insurance Application" section for <u>each</u> qualified employee. The authorization is for both **FHAC** and **B2G** and enables the employee to add or update case information. If the Application Coordinator tries to grant LI authorization to the employee of a lender <u>not</u> approved for LI, an error message will display. Once authorized, the employee will see one new field on the *Insurance Application* Page: "Insure Yes/No." This will be discussed in detail in Section 3.4.

(Send

Reset



Authorization for CH	UMS Applications:		
CAIVRS Authori	zation 🗸 Case Query	✓ Mortgage :	Insurance Certificate
Case Transfer	▼ Refinance #	Authorization 🗹 Underwrite	er Registry
✓ Underwriters	✓ Origination	Reports MIC/NOR L	ist
✓ Mortgagee Perf	ormance Report		
Appraisal Processing:	Add/Update Query (Read-Only) Not Authorized	Case Number Assignment:	Add/Update Query (Read-Only) Not Authorized
Insurance Application:	 ○ Insuring Authorization ◆ Add/Update ○ Query (Read-Only) ○ Not Authorized 	Inspector Assignment:	Add/Update Query (Read-Only) Not Authorized
Non-Profits:	Query (Read-Only) Not Authorized	203k Case Close-Out:	Add/Update Not Authorized
203K Consultants:	Query (Read-Only) Not Authorized	Mortgage Credit Reject:	Add/Update Query (Read-Only) Not Authorized
Notice of Return:	Query (Read-Only) Not Authorized	Borrower/Address Change:	Update Query (Read-Only) Not Authorized

Figure 6. Granting Insuring Authority to Approved Lender Employees.

2.3. Conduct Pre-Insurance Review

With LI, the data entry process (using either **FHAC** or **B2G**) does not change. Lenders still are required to submit the same information about the loan, property, and borrower that they have always submitted in the past. What does change is that now, authorized lender staff—instead of HOC staff—perform the pre-insurance review of the supporting documentation in the CB. In order to comply with FHA's LI Program requirements, lender staff that originated or underwrote the mortgage for insurance <u>may not</u> conduct the pre-insurance review of the loan.

The pre-insurance review must be conducted by someone on the lender's staff who neither originated nor underwrote the mortgage. That is, this person must not have participated in any way in the processing of the mortgage.



Lenders must ensure that required documents are included in the CB, are complete, and are executed appropriately. Similarly, lenders must verify that the insurance application data based upon the CB documents has been entered completely and accurately; the

The pre-insurance review is a documentation and data entry validation process.

data based upon the CB documents has been entered completely and accurately; the data must match the supporting documents in the CB. In short, the lender must be confident that all conditions for insurance have been satisfied by the supporting documents and data integrity. This is not an underwriting review—it is a document and data integrity compliance review.

In addition to certifying that all origination documents are retained in either electronic or paper format, the lender's pre-insurance review should include the following steps (listed in ML 2005-36 included in Appendix C).

- If the loan being reviewed closed more than 60 days ago, verify that the loan is current for the month preceding submission.
- Ensure that no mortgage insurance premium (MIP) late charge or interest is due.
- Review the note and mortgage/security instrument to ensure:
 - ✓ The documents are executed on forms that meet FHA's requirements,
 - ✓ The mortgage maturity meets the requirements of the applicable program, and
 - ✓ The mortgage amount does not exceed the maximum mortgage amount for the area.
- Review form HUD-92900-A, *Addendum to URLA*, page 3, for completion and execution of all appropriate certifications by the underwriter or lender representative.
- Review the property appraisal and any additional documentation supporting the appraised value.
- For 2-4 unit properties, include an executed form HUD-92561, *Transient and Hotel*.
- Include a certificate of intent to occupy by military personnel, when applicable.
- Include an approval letter from the local health authority indicating approval of the individual water or sewer system when applicable.
- For proposed construction loans:
 - ✓ Review form HUD-92544, Builder's One-Year Warranty, and



- ✓ If the mortgage exceeds 90 percent loan-to-value ratio, include evidence that the mortgagee qualifies for a higher ratio loan under one of the applicable provisions in the appropriate regulations.
- Ensure all case warning messages have been cleared.

A more detailed CB checklist will be included in Appendix D.

2.4. Mark Loan Ready to Insure

Once the lender has entered all required data into **FHAC** or via **B2G**, completed the pre-insurance review, and believes the loan meets all FHA requirements for insurance, it will click [Yes] in the "Insurance Decision" field on the *Insurance Application* Page and click "Send." (Figure 7).

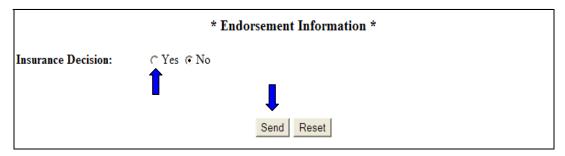


Figure 7. Marking the Loan Ready to Insure.

If the entered data passes all **CHUMS** data edits and processing is successful, the *Insurance Application Results* Page appears with data in the "Insurance Decision," "Insurance Date," and "Insured by" fields (Figure 8). Note the following data about the "Insured by" field:

- ✓ The "Insured by" field is not displayed for non-LI lenders.
- ✓ If the case was insured by the lender, the field displays the **FHAC** User ID of the employee who endorsed the case
- ✓ If the case was endorsed by a HOC staff member, [HOC] is displayed in this field.
- ✓ The **FHAC** User IDs displayed in the field are coded. Notice that the ID shown in Figure 8 starts with [M]. [M] IDs mean the loan was insured based on the lender's data; [H] IDs mean the HOC required the lender to submit the CB for review prior to insuring it and a HUD staff member insured the loan; and [C] IDs mean the HOC required the lender to submit the CB for review prior to insuring it and a HOC contractor insured the loan.



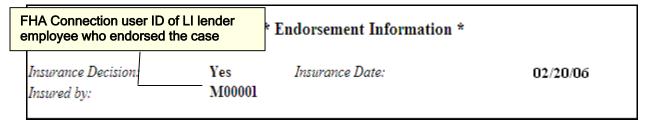


Figure 8. Partial Insurance Application Results Page--LI Insurance Information for Insured Cases.

Figure 9 shows another portion of the *Insurance Application Results* Page with additional information for the insuring lender. The messages at the top show that the LI case has been successfully insured "INSURANCE APPLICATION SUCCESSFULLY COMPLETED / CASE INSURED; QUERY ONLY." However, the case has been selected for post-endorsement technical review "CASE WARNING: BINDER SUBMISSION REQUIRED". The status of the eCB request shows that the LI lender has already successfully transmitted the case to the HOC "EBINDER HAS BEEN RECEIVED BY HOC FOR REVIEW."

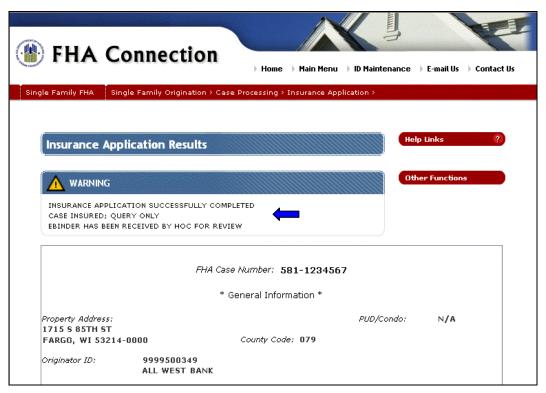


Figure 9. LI Information on the Insurance Application Results Page.

The lender may access the electronic Mortgage Insurance Certification (eMIC) via the Mortgage Insurance Certificate link from the *Insurance Application* Page.



Figure 10. LI Insured Cases are Recorded Automatically.

2.4.1. Processing Cases with Case Warnings

Case warnings, if they are present, will display beneath the "*Insured by*" field. There are two types of case warnings—*Non-Severe* and *Severe*.

The lender is responsible for researching Non-Severe Case Warnings and determining whether they can be cleared. If, after research, the lender believes that the case warnings do not violate FHA program requirements, it may resubmit the loan for endorsement. The lender does not need to acknowledge the warnings and the system will bypass them during the insurance process. Closing Package Logging occurs and the eMIC is made available.

Severe Case Warnings require the submission of the CB to the HOC for preinsurance review. There are three Severe case warnings:

- ✓ **CAIVRS** sanction,
- ✓ Social Security Number (SSN) data validation problem, and
- ✓ HOC indication of a potential risk to FHA presented by this loan.

The lender will know that the loan has a Severe case warning because a message will display on the *Insurance Application Results* Page.⁶ Additionally, FHA will request the CB for pre-insurance review.

Once FHA requests the CB for pre-insurance review, the lender must submit it in either electronic or paper format within ten calendar days of the request date. Only one change must be made for LI lenders submitting paper CBs—the paper CBs must be **yellow** to help identify them as requested LI CBs when they arrive at the HOCs. Otherwise, the process for submitting paper CBs remains the same. Paper CBs must continue to be organized according to FHA's current stacking order requirements.

Paper case binders submitted under the Lender Insurance Program need to be submitted in **yellow** case binders.

⁶ Lenders may also use the *Binder Selection* Page to list all [Requested] CBs. The *Case Query* Page displays the status of an individual CB. This is described in detail in Section 3.5.



LI lenders may choose to submit requested CBs in electronic format. An electronic or digitized CB is referred to as an "eCB" or "eBinder." The standards for the eCB, the list of documents that are to be included and the order in which they must be indexed can be found in the *Electronic Case Binder Developer's Guide* at http://www.hud.gov/pub/chums/electronicCaseBinder.pdf. FHA requires the same documents for both the paper and electronic CBs.

After the HOC has reviewed the case, the HOC either insures the case and makes the eMIC available to the lender, or issues a Notice of Return (NOR). Lenders may access the eMIC or NOR from the **FHAC** *MIC/NOR List, Mortgage Insurance Certificate*, or *Notice of Return* Pages.

2.4.2. Tracking Uninsured eCBs

Lenders may check to see if FHA has received uninsured eCBs using the *Binder Selection* Page to list all eCBs [Awaiting Endorsement]; if received, the date the case was assigned to a HOC staff member will display. The *Case Query* Page displays the status of an individual eCB.

2.5. Checking Insured Case Status

FHA may request CBs for insured loans for quality control reviews (Post-Endorsement Technical Review (PETR) and Appraisal Reviews) and review/audits. PETR cases are selected by **CHUMS** based upon a mathematical algorithm. Appraisal Reviews are selected by the HOCs and an HQ algorithm. CBs may be selected for review/audit at any time after the loan is insured. For both reviews and audits, the case numbers of the CBs the lenders must submit may be viewed in one of three ways.

All LI Lenders should develop a regular daily process for checking to see if any case binders have been requested.

First, within **FHAC**, the *Insurance Application* Page displays a message that the case has been selected for PETR at the time the case is insured.

Second, the lender may view the status of one case at a time via the *Case Query* Page. The *Case Query* Page has been modified to show whether the insurance was processed by the lender, the HOC, or has not been processed. Additionally, it displays four binder statuses:

✓ Awaiting Receipt



- ✓ Electronic Binder Received
- ✓ Paper Binder Received
- ✓ Not Requested

Third, **FHAC** was modified to allow users to track the status of more than one case. This is explained in the next subsection.

2.5.1. Viewing Multiple CBs-The Binder Selection Page

The *Binder Selection* Page was added to the *Case Processing* Menu on **FHAC** for HUD staff and LI lenders. The modified *Case Processing* Menu is shown in Figure 11:

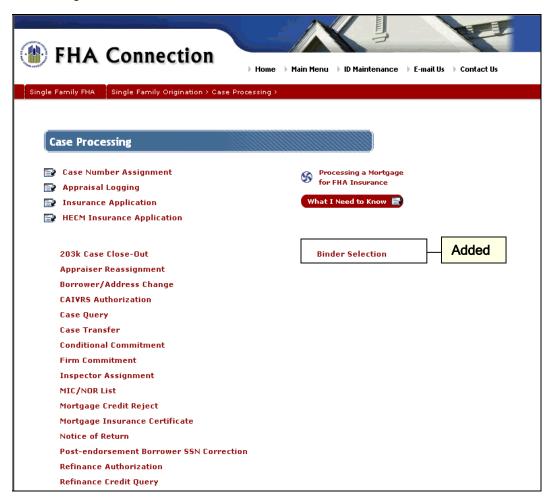


Figure 11. New Binder Selection Option on Case Processing Page.

✓ The *Binder Selection* Page is used to view a list of CBs that the LI lender must submit, sorted by the status of the CB request.

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For LI lenders, the *Binder Selection* Page shows a list of CBs for cases the lender originated or for which it acted as a sponsor or agent. Access to other lender case information is prohibited.

To access the *Binder Selection* Page, lenders click the <u>Binder Selection</u> link on the *Case Processing* Menu. From the *Binder Selection* Page, lenders may choose to list all the cases corresponding to a particular status (one of the four statuses described in Table 2) by clicking one of the choices from the drop-down list in the "Binder Status" field, as shown in Figure 12.

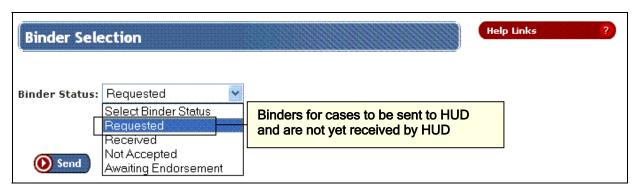


Figure 12. Selecting the Status of LI CBs to View.

Table 2. Binder Statuses for LI CBs.		
Binder Status	Explanation	
Requested	Binders that were:	
	 requested by the HOC for pre- or post-endorsement review, or appraisal review, 	
	 requested by FHA in support of a review/audit, or 	
	 received by the FHA but were unacceptable and must be resubmitted. 	
Received	Binders that were received by the HOC and were acceptable.	
Not Accepted	Binders that were received by the HOC and were unacceptable.	
Awaiting Endorsement	Binders for uninsured cases with Severe Case Warnings that were:	
	 received by the HOC, or 	
	 received by the HOC and assigned to a HOC staff member for processing. 	

An eCB may be unacceptable for any of the following reasons:

✓ File cannot be separated into sections



- ✓ Formatting was incorrect; XML file was badly formatted
- ✓ Insufficient document types
- ✓ Case does not belong to the lender.

When the lender selects the [Requested] binder status on the *Binder Selection* Page, the *Binder Selection – Binders Requested* Page appears (Figure 13):

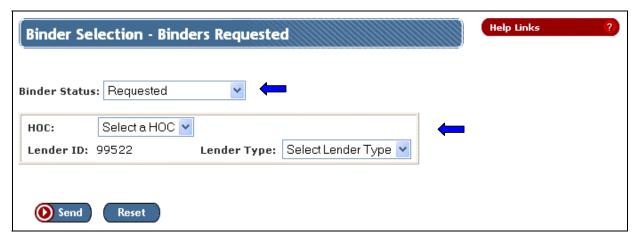


Figure 13. Refining the Selection of Requested CBs.

The Lender selects the name of the HOC from which it is interested in viewing CB requests from the drop-down list in the "HOC" field (the lender may also choose to view CB requests from [All HOCs]). The first five characters of the lender's ten-character FHA ID are displayed in the "Lender ID" field (which is view only). In order to begin the search, the lender needs to select whether it would like to see CB requests for which it is the sponsor/agent, or for which it is the originator from the drop down box in the "Lender Type" field.

When the lender's request is successfully processed, the *Binder Selection Results* - *Binders Requested* Page appears with a list of the CBs that match the search criteria (Figure 14). For this lender acting as an originator, only the Philadelphia HOC has requested CBs at this time:



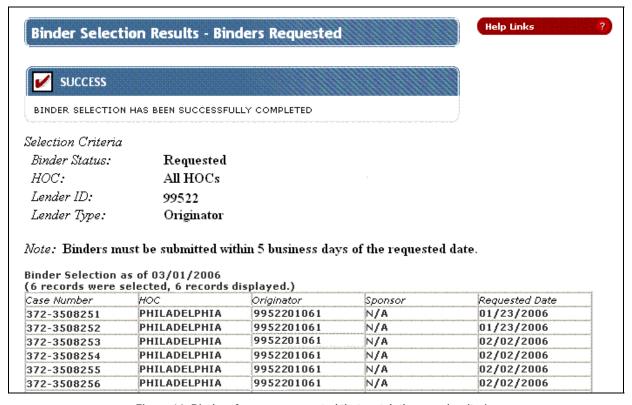


Figure 14: Binders for cases requested that match the search criteria.

If the lender wishes to check the insurance status of a CB requested by the Philadelphia HOC for pre-insurance review, it selects the [Awaiting Endorsement] binder status (Figure 15):



Figure 15. Checking the Status of CBs Awaiting Insurance at the Philadelphia HOC.

As shown on in Figure 16, the *Binder Selection Results* Page displays six cases that are at the Philadelphia HOC and awaiting endorsement.



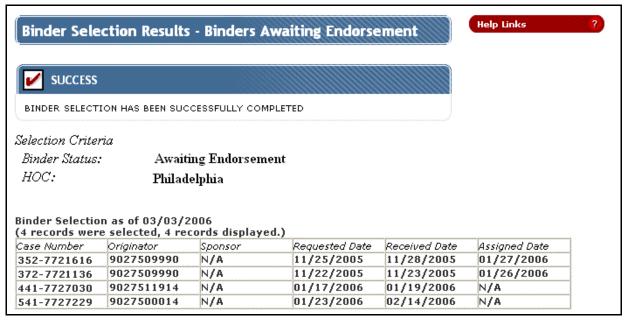


Figure 16. List of CBs Awaiting Insurance at the Philadelphia HOC.

Note that B2G lenders will receive these lists when requested, and should do so on a daily basis. All other lenders should establish a regular daily schedule for checking the *Binder Selection* Page for requested case binders.

2.5.2. Viewing Single CBs-The Case Query Page

Lenders can also use the *Case Query Results* Page to view the binder status and endorsing party for cases processed under the LI program (see **Table 3** and **Figure 17**). These fields only appear for cases having LI lenders, but can be viewed by any lender. Although HECM cases currently are not eligible for the LI Program, an LI lender's HECM cases will display [HOC] in the "Endorsement Processed by" field and [Paper Binder Received] in the "Binder Status" field.

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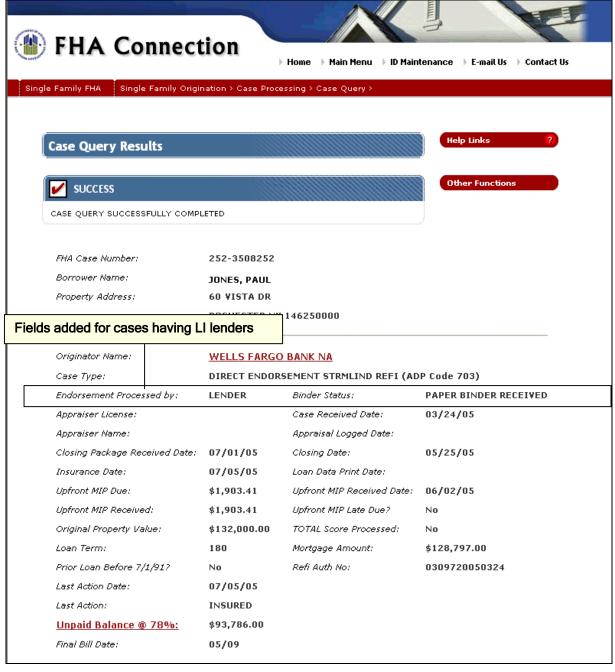


Figure 17. Viewing Endorsing Party and Binder Status on the Case Query Page.

Table 3. New LI Fields on <i>Case Query</i> Page.		
Field	Explanation	
Endorsement Processed by	Institution that processed the case (loan) for FHA insurance. • Lender: FHA-approved lender with authority to endorse its own cases.	



Table 3. New LI Fields on <i>Case Query</i> Page.		
Field	Explanation	
	HOC: HUD Homeownership Center.N/A: Case is not endorsed yet.	
Binder Status	CB status (or closing package status) for an endorsed case originated by an LI lender.	
	 Awaiting Receipt: CB requested by the HOC has not been received. -or- 	
	CB was received but not accepted; must be resubmitted.	
	 Electronic Binder Received: CB requested by the HOC was received electronically. 	
	 Paper Binder Received: CB requested by the HOC was received in paper form. 	
	 Not Requested: CB was not requested by the HOC. 	



3. FHA Staff Processing Requirements

3.1. Overview

With the implementation of LI, HOCs will follow two different processes for handling pre-endorsement, post-endorsement, and appraisal reviews. The process to use depends on whether the submitted CB is paper or electronic. From a HOC perspective, the LI Function can be broken down into the processes illustrated in Figure 18:

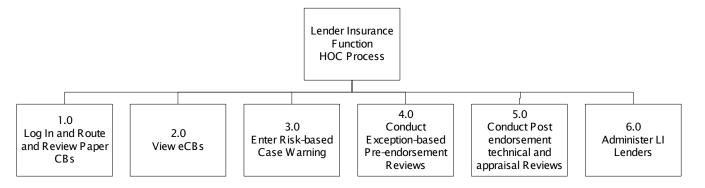


Figure 18. New LI Processes for HOC Staff.

3.2. Log In and Route CBs

HOC staff or contractors will follow the same procedures they do today to log in paper CBs received by the HOC. The only difference is that paper LI CBs will be submitted in a yellow case binder. The **FHAC** Case Processing Page displays new messages if the paper CB is an LI case, indicating whether the CB is required for pre-insurance, post-endorsement, or appraisal review (Figure 19). HOC staff or contractors will route the CB accordingly. In the example below, the eCB was insured and has been requested for Appraisal Review.



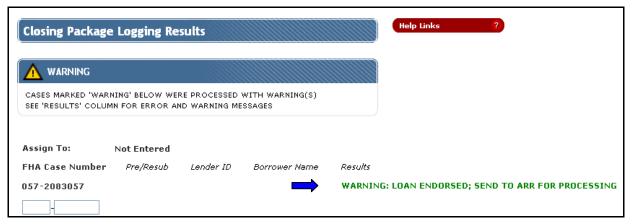


Figure 19. New Messages on Closing Package Logging Results Page.

The automated *Closing Package Logging* process enables the <u>View Electronic</u> <u>Documents</u> link within FHA applications. An indicator has been added to CHUMS to identify whether the CB is paper or electronic.

Now, the *Closing Package Logging* process is performed automatically whenever:

- ✓ A case is successfully endorsed by an LI lender and the eCB is not required for post-endorsement processing,
- ✓ An eCB is received for an un-insured LI case with a Severe case warning, or
- ✓ An eCB is received for an insured LI case that has been selected for Post-Endorsement Technical or Appraisal Review.

3.3. Tracking CBs by Status

FHAC provides HOC staff with two tools for tracking LI Program CB status—*Case Query* for single CBs and the new *Binder Selection* Page for multiple CBs.

3.3.1. Tracking the Status of One CB-The Case Query Page

The Case Query Page shows four potential statuses for LI CBs:

- ✓ Awaiting Receipt
- ✓ <u>Electronic</u> Binder Received (by FHA)
- ✓ Paper Binder Received (by FHA)
- ✓ Not Requested

For insured cases, the institution that insured the case is also shown. If the case has not been insured, an "N/A" displays. A summary of the statuses and insurer information is provided in Table 4.



	Table 4. New LI Fields on <i>Case Query</i> Page.	
Field	Explanation	
Endorsement Processed by	 Institution that processed the case (loan) for FHA insurance. Lender: FHA-approved lender with authority to endorse its own cases. HOC: HUD Homeownership Center. N/A: Case is not endorsed yet. 	
Binder Status	 N/A: Case is not endorsed yet. CB status (or closing package status) for an endorsed case originated by an LI lender. Awaiting Receipt: CB requested by the HOC has not been received. or- CB was received but not accepted; must be resubmitted. Electronic Binder Received: CB requested by the HOC was received electronically. Paper Binder Received: CB requested by the HOC was received in paper form. 	

As shown in Figure 20, the *Case Query Results* Page shows the binder status and endorsing party for cases processed under the LI program. These fields appear only for LI lender cases. (If the staff member is viewing a non-LI case, these fields will not display.) Although HECM cases currently are not eligible for the LI Program, HECM cases will display [HOC] in the "Endorsement Processed by" field and [Paper Binder Received] in the "Binder Status" field.



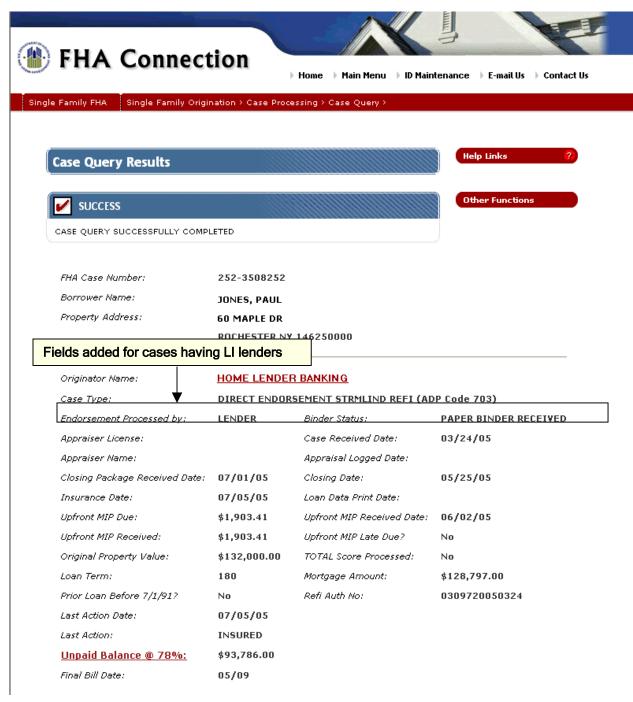


Figure 20. Viewing Endorsing Party and Binder Status on the *Case Query* Page.



3.3.2. Tracking the Status of Multiple CBs-The Binder Selection Page

FHA staff with **FHAC** authorization to one or more **CHUMS** applications have access to the *Binder Selection* Page. As with *Case Query*, *Binder Selection* tracks CBs at four different points; however, the statuses are slightly different:

- ✓ Requested
- ✓ Received
- ✓ Awaiting Endorsement
- ✓ Not Accepted

Note that the "Received" status on *Binder Selection* does not indicate whether the binder was paper or electronic. Table 5 describes what each of these statuses means.

-	Table 5. Binder Selection Statuses for LI CBs.
Binder Status	Explanation
Requested	Binders that were:
	 Requested by the HOC for pre- or post-endorsement review, or appraisal review,
	 Requested by FHA in support of a review/audit, or
	 Received by the FHA but were unacceptable and must be resubmitted.
	The reason the CB was requested is also displayed:
	Pre-Insurance Review
	 Post-endorsement Technical Review
	Appraisal Review
Received	Binders that were received by the HOC and were acceptable.
Not Accepted	Binders that were received by the HOC and were unacceptable. A CB may be unacceptable for any of the following reasons:
	 Case does not belong to the lender (paper or electronic).
	 File cannot be separated into sections (eCB).
	 Formatting was incorrect; XML file was badly formatted (eCB).
	 Insufficient document types (eCB).
Awaiting	Binders for uninsured cases with severe warnings that were:
Endorsement	 Received by the HOC, or
	 Received by the HOC and assigned to a HOC staff member for processing.



The modified *Case Processing* Menu with the new *Binder Selection* option is shown in Figure 21. To access the *Binder Selection* Page, click the <u>Binder Selection</u> link.

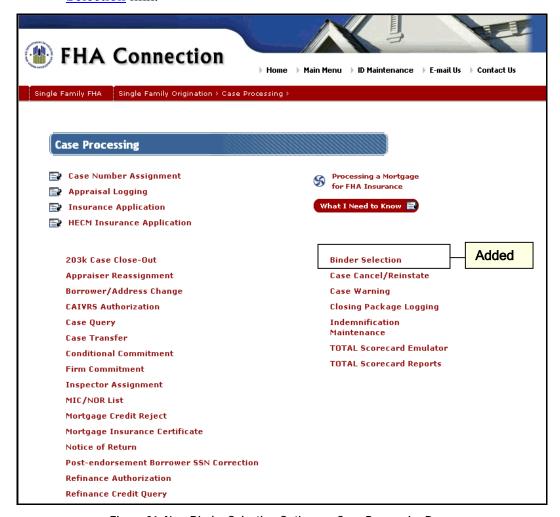


Figure 21. New Binder Selection Option on Case Processing Page.

From the *Binder Selection* Page (Figure 22), select all LI CBs with one of the four statuses described in Table 5 by clicking their choice from the drop-down box in the "Binder Status" field.



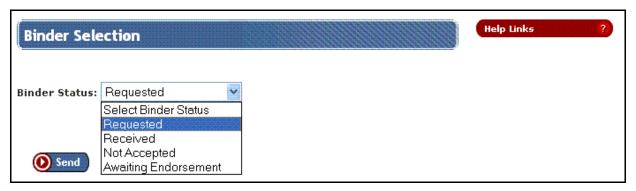


Figure 22. Selecting CBs by Status.

Depending on the particular status, the staff member will be able to refine the search. Figure 23 shows that requested binders can be selected by "HOC," "Lender ID," and "Lender Type." When the list of requested CBs displays, the reason for the request is shown (Pre-Insurance Review, PETR, or Appraisal Review).

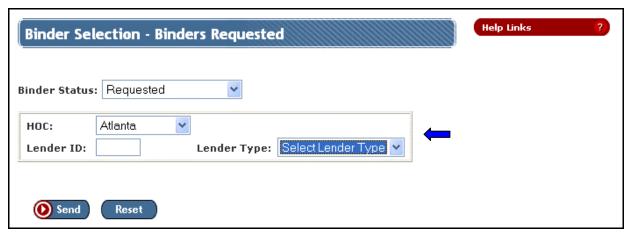


Figure 23. Refining the Search for CBs Requested.

Requests for CBs with [Received] and [Not Accepted] statuses also allow the staff member to enter a date range (Figure 24).



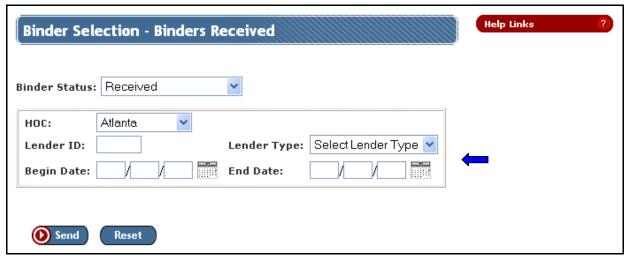


Figure 24. Refining the Search for CBs Received.

HOC staff wishing to review the list of CBs [Awaiting Endorsement] only need to enter their HOC location (Figure 25).

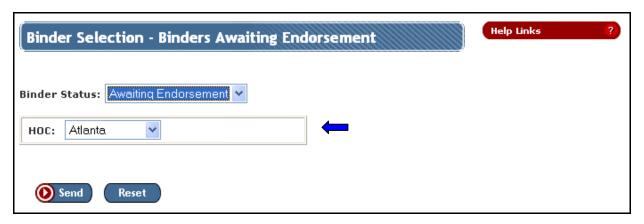


Figure 25. Listing CBs Awaiting Endorsement.

As shown in Figure 26, all CBs awaiting insurance at the Atlanta HOC are displayed, along with the Originator and Sponsor IDs (if applicable), the dates the CB was requested, received, and assigned (again, if applicable). IF the CB was assigned to a staff member, his or her FHAC ID is displayed as well.



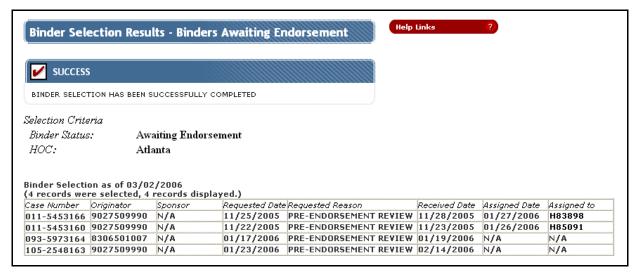


Figure 26. Binder Selection Page Showing CBs Awaiting Endorsement.

3.4. Viewing eCBs

Only authorized FHA personnel can view the full eCB online via **FHAC.** The eCB is displayed in Portable Document Format (PDF). Links to the eCB are provided from the *Insurance Application* Pages, the *Underwriting Report* Pages of the **Underwriter Reporting System (URS),** and most of the **Appraiser Review Report (ARR)** Pages. Within the **ARS**, only HOC staff may view the entire eCB. Field review contractors will see only the appraisal portions of the eCB.

3.4.1. eCB Quality Standards

Lenders go through a testing process prior to being allowed to submit eCBs in response to FHA requests. One part of the testing process involves HOC staff reviewing the eCB documents to ensure that the images are clear, readable, and that all documents required are submitted and are indexed in the correct order. If the eCBs of a lender later fail to meet FHA's requirements, the HOC receiving the unacceptable eCB should coordinate with the other HOCs and HQ prior to providing guidance to the submitting lender.

3.4.2. Accessing eCBs for Pre-Insurance Review

Once the eCB is logged into the system⁷, a new link icon—Next eBinder—displays on the FHAC Insurance Application Page (Figure 27).





Figure 27. New 'Next eBinder Case" Link on the Insurance Application Page.

If additional unendorsed eCB cases are awaiting endorsement, the

Next eBinder icon appears on the *Insurance Application Update* and *Results*Pages.

Click on the icon, the following system processes occur:

- ✓ The *Insurance Application Update* Page with data from the next eCB awaiting insurance displays (Figure 28).
- ✓ This displayed case is assigned to the HOC staff member who opened it.
- ✓ The "Assigned Date" is set to the current date.

A hypertext link to view the eCB--<u>View Electronic Documents</u>--is displayed here and on the *Insurance Application Update* Page. HOC staff can access and view the eCB in PDF format by clicking this link.



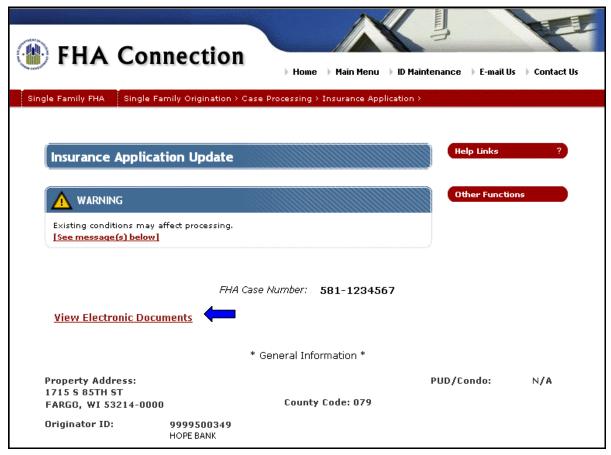


Figure 28. Accessing eCBs for pre-Insurance Review.

The entire eCB is loaded onto the staff member's computer in about 2-4 minutes (Figure 29). On the left side of the Page under "Bookmark" is a list of the index sections of the eCB. HOC staff can use this as a table of contents to move directly to different documents in the eCB. To enlarge a particular document, use the toolbar above it.

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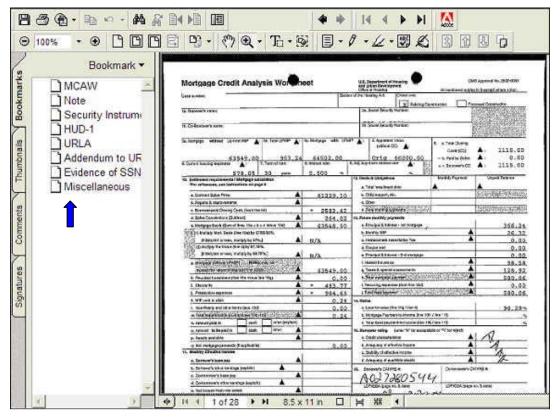


Figure 29. Display of eCB Document.



Entering Risk-Based Case Warnings

If a member of the HOC staff receives information that a particular case may have characteristics that make it risky for FHA, appropriate HOC staff members can enter text on the **FHAC** Case Warning Update Page (Figure 30).

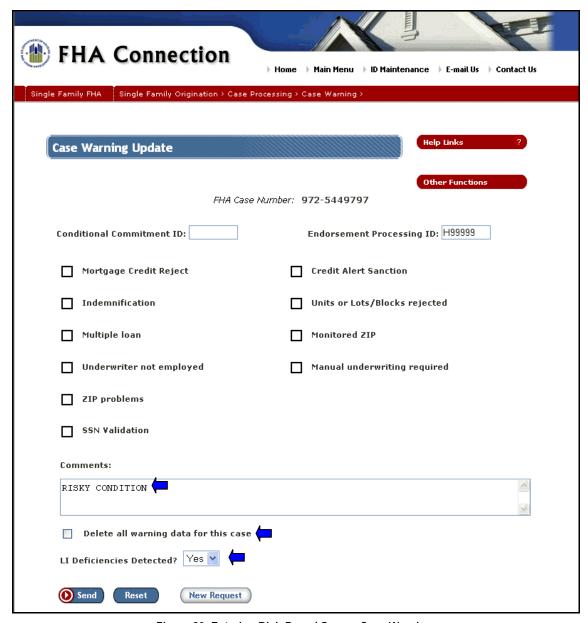


Figure 30. Entering Risk-Based Severe Case Warning.

Figure 30 shows that a staff member has entered text into the "Comments" field indicating that the loan may present a risk to FHA. To trigger a manual Severe case warning, the staff member also must select [Yes] from the drop-down box in the "LI



Deficiencies Detected?" field. Severe Case Warnings may not be cured by the lender after the lender attempts to insure and require the lender to submit the CB to the HOC prior to endorsement. If the staff member later determines that the condition has been resolved, he or she simply checks the box "Delete all warning data for this case" to clear the entered risk warning. System-generated case warnings are not deleted by this action. Only text entered by the HOC will be deleted. If the staff member simply wants to add comments without triggering a Severe Case Warning, they may do so and select [No] from "LI Deficiencies Detected?" drop down box.

3.5. Accessing eCBs for Pre-Insurance Review

Whenever an eCB is received by the eCB System for pre-insurance review, the *Closing Package Logging* process is performed automatically. Once the eCB is logged into the system, a new link on the **FHAC** *Insurance Application* Page, the Next eBinder Case icon displays. Click on this link, and the following system processes occur:

- ✓ The *Insurance Application Update* Page with data from the next eCB awaiting insurance displays.
- ✓ This displayed case is assigned to the HOC staff member who opened it.
- ✓ The "Assigned Date" is set to the current date.

A hyperlink to view the eCB--<u>View Electronic Documents</u>--is displayed here and on the *Insurance Application Results* Page, (Figure 32). HOC staff can access and view the eCB in PDF format via this link.



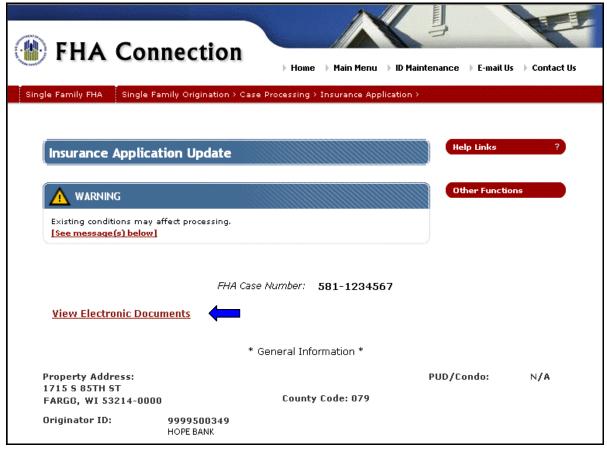


Figure 31. Accessing eCBs for pre-Insurance Review.



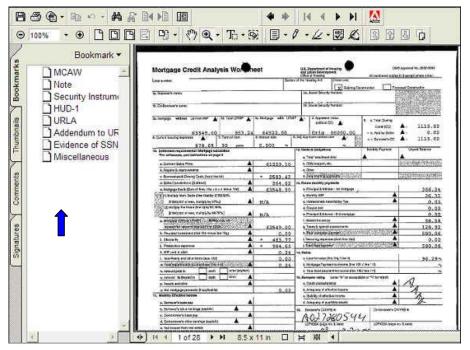


Figure 32. Display of eCB Document.

The entire eCB is loaded onto the local computer in about 2-4 minutes (Figure 33). On the left side of the Page under "Bookmark" is a list of the main sections of the eCB. HOC staff can use this as a table of contents to move directly to different documents in the eCB. To enlarge a particular document, use the toolbar above it.

HOC staff may also use the *Binder Selection* Page to list all eCBs that are [Awaiting Endorsement.] This shows the date the case was assigned to a particular staff member, as well as the staff member's FHAC User ID.

3.6. Conduct Exception-Based Pre-Insurance Reviews

HOC staff will perform pre-insurance reviews on an exception basis only for LI loans. Only three situations will require the submission of a CB for pre-insurance review by the HOC:

- ✓ **CAIVRS** Warning
- ✓ SSN/Borrower Name Mismatch
- ✓ HOC-entered Risk-Based Text

As described in section 4.2, if a paper CB has been submitted by the lender, the insurance or mail clerk will route it to the appropriate pre-insurance staff member and it will be processed the same as it is today.



For eCBs, HOC staff access the next available CB as described in Section 4.5, above. The staff member reviews the eCB as well as information on the **FHAC** *Insurance Application* and *Case Warning* Pages. If the staff member determines that it is insurable, he or she will insure the case using the same process as today. If the case is not insurable, he or she will "NOR" the case. Staff will provide a very specific reason for rejecting the loan and include contact information so the lender may contact him or her directly with any questions. Once the review is initiated by HOC staff, the HOC staff will be responsible for completing the final review and determining whether the loan can be insured. Note that HOC staff will not be able to insure LI eCBs using **CHUMS**; they must use **FHAC**.

HOC staff can identify whether a case needing pre-insurance review is paper or electronic from a new message on the bottom of the CHUMS F17EBT *Mortgage Insurance Certification* (9100) screen (Figure 34). The message, "QUERY ONLY; MUST REVIEW AND ENDORSE ON FHAC INSURANCE APPLICATION" means that the staff member must access the **FHAC** *Insurance Application* Page to view the eCB and determine if it is insurable.

Lenders can learn the disposition of the case by viewing the *Binder Selection* or *Case Query* Pages.



```
F17EBT
                                CHUMS
                                                         Proc ID: MA6254
                    MORTGAGE INSURANCE CERTIFICATE (9100) Date: 08/01/05
                          FHA Case No: .571-123456-7
ADP Code 703 Program ID 00 LTV 97.00 Solar N Loan Purpose 1 Borrower Type 1
Repair: Escrow Y/N N Complete / Amount .00 Gross Mthly Inc 4167
Borrower PALEY, GEORGE V
                               SSN/TIN S 233-33-3337 Sex 1
 Coborrower
                                 SSN/TIN - -
 Coborrower
                                SSN/TIN
                                                       Exempt from SSN N
Rent N No.Yrs 0 FTHB N Counsel Type A Vet Pref N EEM NA Manufact Hsng Y
                                     PUD N
                                            Lot/Blk/Plat EEM Escrow
Address: 118 VALLEY VIEW ST
Cnty 081 MIDWAY WV
                                258780000
Orig 2222200002 Sponsor/Agent
Mortgage Amount 73348 Interest Rate 6.500 Monthly Payment(P&I) 463.61
Maturity Date 05/2035 Duration in Months 360
Amortization Arm Type First Payment 06/2005
                                              Warranty
Construction Type 4 Living Units 1 MIP Financed Y/N Y Cash MIP 0.98
Clsg/Disb 04/29/05 Review Y/N N Endorse Y/N N Endorse Date / / By
Appr ID WV0174
       TYREE, MICHEAL K 203k Consultant ID
                                   H-Rating I-9100 Auxiliary Screen R-NOR
       P-Print S-Spool 1, 2, 5, 9 1-Continue Next Case 571-
QUERY ONLY; MUST REVIEW AND ENDORSE ON FHAC INSURANCE APPLICATION
```

Figure 33. New eCB Data on CHUMS MIC (9100) Screen.



3.7. Accessing eCBs for Post-Endorsement Technical Review

To access the images of the eCB documents to conduct the review, PETR reviewers follow the steps below.

- Step 1. Access the *Box Loading Selection* Page of the **Underwriter Review System** (URS).
- Step 2. Select LI cases for which eCBs have been received by clicking on the "eBinder" box as shown in Figure 35.

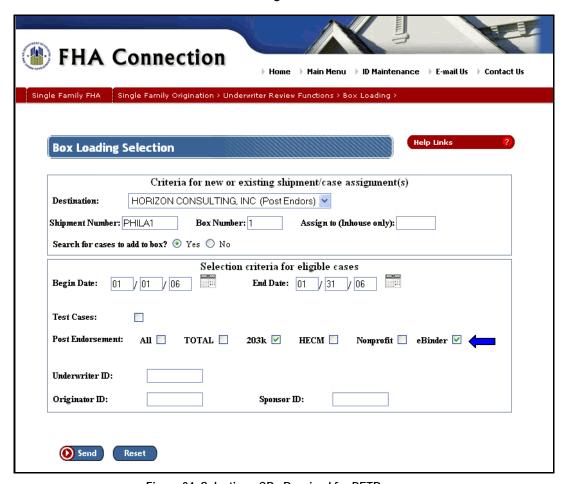


Figure 34. Selecting eCBs Received for PETR.

Selecting "eBinder" displays the *Box Loading Update* Page with a list of cases:

- ✓ Processed under the LI Program,
- ✓ Insured and selected for PETR, and
- ✓ For which an eCB has been received.



To help PETR staff identify the type of CB with which they will be working, a new field, "Binder Type," was added to the following Pages. "Binder Type" can be either [Paper] or [Electronic]:

- ✓ Box Loading Update
- ✓ Box Loading Results
- ✓ Box Receipt
- ✓ Box Complete and
- **✓** *HOC Box Complete*.

The new field, "Reason for Review," has also been added to the *Box Loading Update*, *Box Loading Results*, and *Underwriting Report* Pages. Reasons for Review include: Lender, Manual Selection, Algorithm, 203K, and LI Lender First 5 Cases.

Figure 36 shows the two new fields as they appear on the Box Loading Update Page.



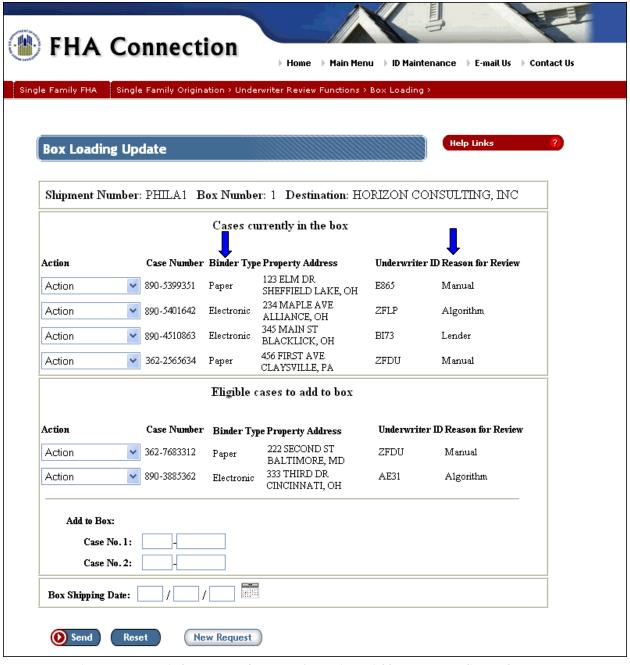


Figure 35. New "Binder Type" and "Reason for Review" Fields on Box Loading Update Page.

- Step 3. Access the *Underwriting Report Update* Page (Figure 37).
- Step 4. Click on the <u>View Electronic Documents</u> hyperlink to display the contents of the eCB.



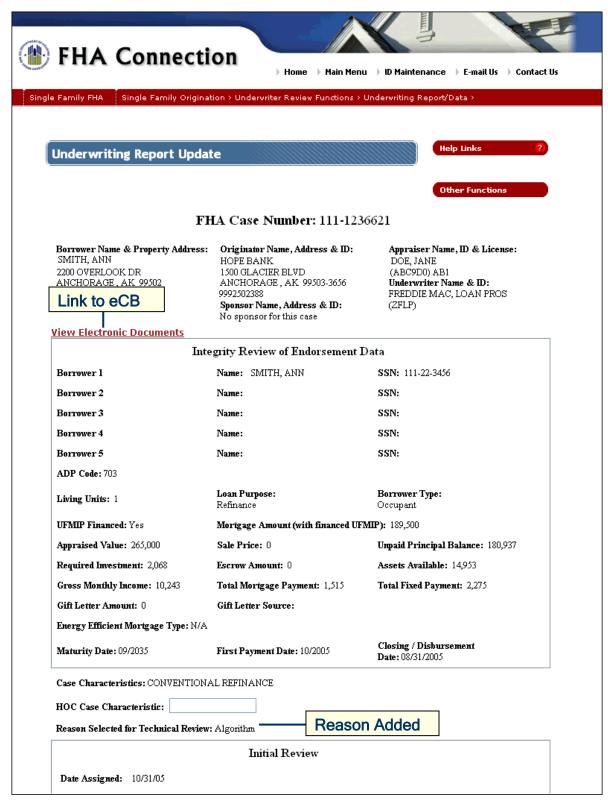


Figure 36. Accessing eCBs from the *Underwriting Report Update* Page.



Because under the LI program FHA is relying on the lender, not staff, to perform the pre-insurance review, an additional task of the PETR reviewer will be to validate the quality of the data in the CBs against that entered by the lender into **FHAC/B2G**.

The report F17JGC will include a count of the number of eCBs that have completed PETR. Reports F17LQC and F17JLC will be modified to show the total number of eCBs completing PETR and the percentage of all PETRs being performed on eCBs, as well as the percentage of endorsed cases that are lender insured.

Finally, note that all post-endorsement changes to a case are done by HOC staff.

3.8. Accessing eCBs for Appraisal Review

Finally, HOC staff will view the eCBs for an appraisal desk review the same way they do today, viewing just the appraisal portion of the eCB. The hyperlink to the eCB, View Electronic Documents, has been added to the following Pages:

- ✓ *Appraiser Review Status Update* (Figure 37).
- ✓ Completeness Check Pre Desk Review
- ✓ Field Review Feasibility Checklist
- ✓ Desk Review Tracking
- ✓ Field Review Submission
- ✓ Form Processing
- ✓ Completeness Check Post Field Review
- ✓ ARR Scoring Form
- ✓ Rating Tracking





Figure 37. Accessing eCB from Appraiser Review Status Update Screen.



Note that if the user is a Field Review Contractor, only the appraisal portion of the eCB will display. HOC staff members have access to the entire eCB.

3.9. Administer LI Lenders

Section 2.2 of this Guide describes lender eligibility requirements for the LI Program. The HOC's CHUMS Coordinator, with the authorization of the PUD Director, can view and update the lender's record to reflect its LI status on the *CHUMS Title II Institution File – F17SIT* Page. Figure 38 illustrates this using the record of a fictitious lender. A new field, "Lender Insurance" is populated to indicate one of the following four statuses:

- ✓ [L] Approved for the LI Program; submits paper CBs upon request
- ✓ [E] Approved for the LI Program; submits eCBs upon request
- ✓ [W] Withdrawn from the LI Program
- ✓ [R] Removed from LI Program based on yearly review

The date next to the status code is the effective date of that particular status.

If a lender is approved for the LI program to submit paper CBs, and then later successfully completes testing to submit eCBs; its status needs to be changed to [E]. The LI lender whose record is shown in Figure 23 submits paper CBs, as indicated by the "L" status in the "Lender Insurance" field. It has had this LI status since September 17, 2005.

The manual process of removing a lender from the LI Program must be done by the HOC's **CHUMS** Coordinator. Only the Processing and Underwriting Directors at each HOC may make the determination to remove a lender from the LI Program.

The new LI Sanctioning module that will be used to administer LI lenders is scheduled to go into production in mid-April, 2007. At that time, HUD staff will no longer use the CHUMS screen to administer LI Lenders. There will be a new FHA Connection screen that will show the full history of the lender's LI status. This new screen will allow HUD staff to choose the proper status from a drop down box. It will show an English description of the status as opposed to a status code, however the code will be reflected in CHUMS. There will be a broader selection of statuses, which will be used by HUD staff to track why the authorization was removed, and when it should be reinstated.



HOC staff will review the F17LYCA-Lenders Removed from Lender Insurance Authorization report, each month, and notify those lenders that are no longer eligible to participate. A sample termination letter is included in Appendix D.



F17SIT T	TITLE II INSTIT	UTION FI	LE	Proc ID: HH68 Date: 04/22/05
Inst-ID: 1234567890 Name:	HOME LOAN CORP	•	Home	TIN: 512345678
Mailing Address MIC Address				Address
Attn: CHIEF EXECUTIVE OFFICER Attn: CHIEF_EXECUTIVE_OFFICER_				JTIVE_OFFICER_
St Addr: 1234 CIRCLE PARKWAY	Z .	St Addr:	1234_CIRCLE	E_PARKWAY_
City: ATLANTA	State: GA	City:	ATLANTA	State:
GA				
Zip: 303396077		Zip:	303396077	
Mtgee Type: 3 DE Review 1 In	n: _10 Actual %	: DE 0	.0 HUD 0.0)
Review next _30 cases for (F	F)ield or (T)ed	hnical T	Cases revie	ewed 0
Approval Last Trans:	4/03/03 Phon	ne: (999)	555-1234	
HUD: A / /	Lend	ler Insura	ance: L Nat	1 09/17/05
DE: A / /	Unconditional:	Local	/ / Nat	1 03/10/05
DE HECM: A / /	Unconditional:	Local	/ / Nat	1 03/10/05
Disciplinary Actions R	Rtn QC	Re-	Mtgee	
Imposed Lifted P	Clsng Plan	Train	Monitor 1	[G
1)///		_	_	
2)///		_		
3)///		_		
Enter: C Query by: (S)pnsr or (L)n C	C-Change _ Crspndt or (A)u	ıth Agent	or (P)rncpl	1, 2, 5, 9 L or (R)egion _

Figure 38. LI Statuses on the Title II Institution File



Appendix A. List of Acronyms

Acronym	Definition
ATL	Atlanta HOC
B2G	Business-to-Government (a network connection between FHA and its business partners)
CAIVRS	Credit Alert Interactive Voice Response System
СВ	Case Binder
CFR	Code of Federal Regulations
CHUMS	Computerized Homes Underwriting Management System
DE	Direct Endorsement
DEN	Denver HOC
eCB	Electronic Case Binder
eMIC	Electronic Mortgage Insurance Certificate
FHA	Federal Housing Administration
FHAC	FHA Connection
FHA-SF	Federal Housing Administration's Office of Single Family Programs
HECM	Home Equity Conversion Mortgage
HOC	Homeownership Center
HUD	Department of Housing and Urban Development
LI	Lender Insurance
MIP	Mortgage Insurance Premium
ML	Mortgagee Letter
NOR	Notice of Rejection - Non-Endorsement Notice (Form HUD-59100)] (issued by HOCs to lenders when there are errors in a CB)
рСВ	Paper Case Binder
PDF	Portable Data File
PETR	Post-Endorsement Technical Review
PHIL	Philadelphia HOC
SA	Santa Ana HOC
SSN	Social Security Number
URLA	Uniform Residential Loan Application
URS	Underwriting Reporting System

Appendix B. Sample Reports

CHUMS Reports Created or Modified for LI/eCB Processing		
Report Number	Description	
CHUMS F17 LYCA	NewLenders Removed from Lender Insurance Authorization	
CHUMS F17ISCA	New - LI Lenders Approved, Withdrawn, or Removed and totals	
CHUMS F17IQCA	Modified to show whether a CB is paper or electronic	
CHUMS F17IZCB	Modified to show whether a CB is paper or electronic	
CHUMS F17JGC	Modified to include a count of the number of eCBs that have completed technical review	
CHUMS F17JLC	Modified to show the total number of eCBs completing PETR and the percentage of all tech reviews being performed on eCBs, as well as the percentage of endorsed cases that are lender-insured	
CHUMS F17LQC	Modified to show the total number of eCBs completing PETR and the percentage of all tech reviews being performed on eCBs, as well as the percentage of endorsed cases that are lender-insured	
CHUMS F17NGC (Warning Report)	Modified to show changes related to risk-based text case warnings	

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Appendix C. Mortgagee Letter 2005-36

September 23, 2005

MORTGAGEE LETTER 2005 - 36

TO: ALL APPROVED MORTGAGEES

SUBJECT: Lender Insurance Program

The Federal Housing Administration (FHA) is pleased to announce that the Lender Insurance (LI) program will be offered beginning on January 1, 2006. LI enables high-performing FHA approved Direct Endorsement mortgagees with acceptable default and claim rates, under authority that will be delegated to them pursuant to section 256 of the National Housing Act (NHA), to endorse FHA mortgage loans without a pre-endorsement review conducted by FHA. Instead, an LI-approved mortgagee will perform its own pre-endorsement review and enter mortgage loan level data to FHA via the FHA Connection. The FHA Connection will perform an automated verification process to check the data for accuracy and completeness. The mortgagee then will be able to endorse the mortgage loan automatically.

LI eliminates the mortgagee's submission of case binders to FHA and having FHA review the application for mortgage insurance before FHA endorsement of the mortgage for insurance. The need to submit case binders to satisfy Notices of Return (NORs) is dramatically reduced under LI. FHA will continue to select a sample of mortgages for post-endorsement technical review (PETR). A mortgagee may submit case binders for PETR in paper or digitized format. For mortgagees choosing to submit case binders electronically, all mailing costs associated with the mortgage insurance endorsement process will be eliminated.

The Basics of the Lender Insurance Program

Mortgagees will submit loan level data —as they do now—via the FHA Connection, Business-to-Government (B2G), or other means to FHA. Upon transmitting sufficient data to satisfy FHA of the legitimacy of the mortgage insurance request, FHA's system will acknowledge receipt of the data. When the mortgage endorses the mortgage loan through FHA Connection, FHA's system will generate a mortgage insurance certificate electronically to serve as evidence that the mortgage has been insured. For those submissions of loan-level data sets that clear all of the risk-mitigation edits that FHA has in place, e.g., loan amount, social security number checks, and others, the mortgagee will not be required to provide a case binder in advance of endorsement. Only if the loan-level edits suggest that the mortgage application must be reviewed before endorsement, or when the loan is selected for a post-endorsement technical review or review of the appraisal, will a case binder be required. Participating mortgagees will

then either submit a paper case binder to the jurisdictional Homeownership Center (HOC) or, if the mortgagee chooses the electronic case binder option, the electronic case binder will be submitted to FHA using a secure file transfer protocol.

There are three categories for mortgage endorsement processing under LI:

- <u>LI Eligible/No Binder Request</u>: The mortgagee endorses the mortgage and FHA generates an electronic mortgage insurance certificate (eMIC), which the mortgagee may view on-line, and there is no request for a case binder to be sent to FHA.
- <u>LI Eligible/Binder Request</u>: The mortgagee endorses the mortgage, FHA generates an eMIC, and FHA requests the case binder for PETR purposes. The case binder request will appear on the FHA Connection Binder List screen or B2G function. This information also will be shown on the Insurance Application screen and the Case Inquiry screen will indicate if FHA has requested a binder and, after sending the binder, when FHA has received it.
- <u>LI Deficient</u>: A high level case warning was triggered (e.g., CAIVRS exception) or system edits reject case (e.g., mortgage amount exceeds statutory limit). FHAC/CHUMS will not be requesting that deficient cases be sent to the HOCs but instead will inform the mortgagee that it must resolve any rejection message. Only cases that FHA's data system detects have severe case warnings (e.g., CAIVRS exception, SSN not verified, some text messages) will be requested for FHA to review. Under this exception processing procedure, the case binder must be submitted to FHA for a pre-endorsement review unless the mortgagee is able to correct the deficiency and resubmit the endorsement data through the automated data verification. If the resubmission is successful, the mortgage is eligible to be processed through LI, and the mortgagee can endorse it for insurance and generate an eMIC. If the mortgagee cannot correct the deficiency, the system will withhold the mortgagee's ability to endorse the mortgage loan until the stated deficiencies are corrected.

For mortgagees that are qualified to participate and wish to do so, all of their FHA-insured mortgages will be processed for endorsement in this manner, i.e., FHA's system provides an electronic acknowledgment of endorsement predicated solely on an electronic data set. For those mortgagees submitting digitized case binders, both the PETR function and the endorsement processing of mortgage applications that fail the pre-endorsement edits will be performed using digitized case binders.

Mortgage Loan Eligibility for Lender Insurance

FHA is phasing in the LI program. At this time, LI approved mortgagees will process and endorse for insurance mortgage loans under FHA's basic mortgage insurance programs, including sections 203(b), 203(h), 203(k), 234(c), 247, 248, and adjustable rate mortgages of the NHA.

Participation Requirements for Mortgage Lenders

As stated in HUD regulations, in order to be eligible to participate in the Lender Insurance program, a mortgagee must be an unconditionally approved Direct Endorsement mortgagee and have 2 years' acceptable default and claim rate. For DE mortgagees that underwrite as sponsors for FHA-approved loan correspondents, the default and claim rate is the aggregate of both retail originations and mortgages underwritten for their loan correspondents. LI eligibility is company-specific and not determined at the branch level. The acceptable claim/default rate is defined as at or below 150 percent of the national average. DE lenders that operate in only one state have the right to have a compare rate using FHA loans made in that state only rather than the national average. FHA will monitor a mortgagee's default and claim rate eligibility to participate in the Lender Insurance program on a yearly basis. Mortgagees can determine if they have an acceptable default and claim rate by examining their performance through Neighborhood Watch Early Warning System at https://entp.hud.gov/sfnw/nw/.

After a DE mortgagee elects to participate and is approved as an LI approved mortgagee, it must process and endorse for insurance all of the loans it originates or underwrites through LI. It must also conduct a "pre-insurance" review and do so using staff that neither originated nor underwrote the mortgage. FHA's requirements for the pre-insurance review are described elsewhere in this mortgagee letter.

Request to Participate

DE mortgagees electing to participate in the LI program must request approval. Similar to the requirement for using FHA's TOTAL Mortgage Scorecard, access to the LI program will be conditioned upon the mortgagee's certification, executed as an electronic acknowledgement through the FHA Connection, that it will comply with the LI program's procedures and requirements. Each mortgagee must acknowledge prior to participating that it is eligible under the LI program and will participate according to applicable regulations, this mortgage letter, and other written instructions from FHA.

FHA will confirm that the mortgagee is unconditionally DE approved and has an acceptable FHA default and claim rate, and notify the mortgagee electronically that it is approved for the LI program.

Approval for LI will be effective for one year. At the end of the one-year period, the mortgagee will be automatically checked by FHA's system of records. If the mortgagee's claim/default performance continues to be acceptable and meets all other approval criteria for LI participation, the mortgagee's approval will be renewed for another year.

All case numbers assigned after the mortgagee has obtained FHA's approval to participate in LI must be endorsed through the LI process.

Electronic Case Binder

Mortgagees participating in the LI program may choose to submit electronic case binders (eCB) to HUD when a case binder is requested. The eCB must include all of the documents previously required in hard copy binders submitted for endorsement, as provided in HUD Handbook 4165.1, REV-2, paragraph 1-5 and in the Electronic Case Binder Developer's Guide at http://www.hud.gov/pub/chums/electronicCaseBinder.pdf. The standards for indexing requirements of the documents within the eCB can also be found in the eCB Developers' Guide.

Once a mortgagee agrees to participate in LI with the electronic case binder option, its first five requests for endorsement will result in a request for the digitized case binder back to the mortgagee. This quality control measure will be used to make certain that the mortgagee is able to transmit an acceptable digitized case binder for FHA's review.

FHA intends to make electronic case binders a LI program requirement once it has had sufficient time to examine the process and determine if any amendments or changes are necessary. High-volume mortgagees are encouraged to develop an electronic submission capability to take advantage of the substantial time and cost savings associated with paperless LI.

Selection of Case Binder for Review

For those mortgage insurance applications that the mortgagee endorses for insurance through the LI program that receive an electronic notice of intent to review, the mortgagee must provide the case binder, either in paper or digitized format, depending on which process the mortgagee has chosen, within 5 business days of FHA's transmittal of its request. Failure to submit 5 or more requested case binders to the applicable Homeownership Center will result in a suspension of the mortgagee's eligibility to submit files under the LI program until the mortgagee submits the case binders in a satisfactory manner.

For those mortgage insurance applications that the mortgagee is unable to endorse due to system edits or other reasons, FHA requires the case binder for FHA to conduct a preendorsement review of the file. Such mortgage insurance applications cannot be approved until FHA has reviewed the case binder and determined insurance eligibility.

The Lender Insurance Regulations

The regulations governing Lender Insurance are in the Code of Federal Regulations and include sections 24 CFR §§ 203.4, 203.6 and 203.255(f). Termination provisions for individual lenders are at 24 CFR § 203.4(d). A summary follows:

Approval and Continued Eligibility Conditions:

- Mortgagee has unconditional DE authority with an acceptable default and claim record for two years prior to its application for participation in the LI program
- Acceptable default and claim rate is at or below 150 percent of national average

- FHA will perform an annual review of the mortgagee's continued eligibility to participate
- Mortgagee agrees to indemnify FHA under the conditions of Section 256(c) of the National Housing Act

Termination Provisions:

- Failure to adopt and employ prudent review techniques
- Termination of Direct Endorsement approval for the mortgagee or any branch also terminates LI for the mortgagee or any branch
- Failure to meet the above listed eligibility criteria

The Pre-Insurance Review

LI approval does not alleviate mortgagee responsibility for completion of a pre-insurance review nor does the pre-insurance review negate the lender's obligation to ensure that the loan is in compliance with all applicable HUD requirements. The same staff that originated the mortgage or underwrote the mortgage for insurance cannot complete the pre-insurance review. While there is no reduction in the documents required in a case binder, whether digitized or paper, minimum requirements for pre-insurance reviews are outlined below. In addition to certifying that all origination documents are retained in either electronic or paper format, the pre-insurance review will consist of:

- 1. Verification that the loan is current for the month previous to submission for all loans logged by the lender for lender insurance more than 60 days after loan closing;
- 2. Review of the note and mortgage/security instrument ensuring the documents are executed upon forms which meet the requirements of the Secretary, the mortgage maturity meets the requirements of the applicable program, and the stated mortgage amount does not exceed the maximum mortgage amount for the area;
- 3. Review of form HUD-92900A, page 3 for execution of all appropriate certifications by the underwriter or lender representative;
- 4. Review of the property appraisal and any additional documentation supporting the appraised value;
- 5. Review of form HUD-92544, Warranty of Completion, for proposed construction cases;
- 6. Inclusion of an executed form HUD-92561, Transient and Hotel for all 2-4 unit properties, when applicable;
- 7. Inclusion of a certificate of intent to occupy by military personnel, when applicable;
- 8. Inclusion of an approval letter from the local health authority indicating approval of the individual water or sewer system;
- 9. Inclusion on proposed construction, if the mortgage exceeds 90 percent loan-to-value ratio, evidence that the mortgagee qualifies for a higher ratio loan under one of the applicable provisions in the appropriate regulations;
- 10. Verification that no mortgage insurance premium (MIP), late charge or interest is due;

11. Clearance of all applicable case warning messages

Record Keeping Requirements for Participants

Each LI mortgagee must maintain, as they do now, their origination binder in either hard copy or electronic format for two years from the date of endorsement. Servicing mortgagees must maintain the case binder for a period of two years beyond the life of the loan. It is imperative that the servicing mortgagee use due diligence in obtaining a complete origination binder for all FHA loans it services. Mortgagees retaining eCBs need not maintain a separate version of the eCB indexed for electronic submission to HUD. However, if HUD requests a case binder which is maintained electronically, the Mortgagee must follow standards and procedures set forth in the eCB Developers' Guide for submission of the eCB to HUD.

If you have any questions regarding this Mortgagee Letter, please contact your Homeownership Center (HOC) in Atlanta (888-696-4687), Denver (800-543-9378), Philadelphia (800-440-8647), or Santa Ana (888-827-5605).

Sincerely,

Brian D. Montgomery Assistant Secretary for Housing-Federal Housing Commissioner

Appendix D. Pre-Insurance Review Checklist

Last Updated: 9/09/2005 66

Appendix E. Frequently Asked Questions about the LI Program

The LI Program

Eligible Loan Products

- Q: What loan products can be insured in the LI Program?
- A: All loan products except for HECMs. The HECM process has not changed and still requires submission of the paper case binder (CB).
- Q: When will HECMs be eligible for LI?
- A: Development of this capability is in process. FHA will provide periodic updates on development status.
- Q: How will 203(k) cases be processed under LI?
- A: 203(k) loans will be processed like all other LI loans.

Eligible Lenders

- Q: Am I eligible to participate in LI?
- A: Lenders meeting the following criteria are eligible to participate in the LI Program:
 1) Be an unconditionally approved Direct Endorsement (DE) Mortgagee for at least 2 years.
 - 2) Have a default/claim rate at or below 150% of:
 - the national average rate for all insured mortgages for national lenders or
 - the state average rate for insured mortgages for lenders operating in a single state.
- Q: How exactly do I determine if I am eligible to participate in LI?
- A: Access the Neighborhood Watch System at https://entp.hud.gov/sfnw/nw/ using the following steps:
 - 1. Select Early Warnings
 - 2. Select Single Lender
 - 3. Type the first few letters of the lender's name or the five digit lender id.
 - 4. Select **Direct Endorsement Lender** from the **Mortgagee Selections** window.
 - 5. Select **Current Defaults** from the **Default Choices** window.
 - 6. Select the most recent date from the **Performance Period** window.
 - 7. Select **Nationwide Totals** (lenders with endorsements in more than one state) or **States** (lenders with endorsements in one state) from the **Show Data for** window.
 - 8. View the **Total Compare Ratio** (Compare ratio for all Direct Endorsement loans including both retail and sponsored). If the compare ratio is 150 or less the lender will be LI eligible.



- Q: Must lenders be eCB-capable in order to participate in the program?
- A: No.
- Q: How do I sign up for LI?
- A: The lender's Application Coordinator completes the application process online using *FHA Connection*. Lenders should not send applications to the HOC to participate in LI.
- Q: Once I have applied and been approved for LI, does the FHAC or B2G process change?
- A: The only change is that you will see one new field on the *Insurance Application* Page: "Insure Yes/No." Once lenders have completed their pre-endorsement review and believe the loan to be compliant with FHA's program requirements, the designated staff member simply selects "Yes," and submits the loan for processing.

Lender Approval/Suspension

- Q: If one branch loses <u>DE</u> status, will all branches lose <u>LI</u> ability, even if they have retained DE approval?
- A: As long as the branch losing DE status is not the home office, no other branches will be affected.
- Q: Do lenders get an advance warning if they are going to be removed?
- A: We anticipate that lenders will be advised on impending suspensions but there are no guarantees.

The LI Process

- Q: What should the lender's pre-insurance review process check for?
- A: The pre-review process is a documentation validation process. Lenders should verify that all documents are in the case binder and are executed, and that FHAC data is entered appropriately. In short, lenders should confirm that all conditions for insurance have been satisfied. It is important to double-check that the data entered into FHAC matches data on the documents in the case binder.
- Q: Once I indicate that the loan is ready for endorsement, is approval received online, or is there a waiting period?
- A: A message will display online indicating whether or not the loan was accepted for FHA insurance.



- Q: What happens if my loan is not accepted for endorsement based upon my data entry?
- A: An error message will display on FHAC, along with any case warnings.
- Q: What do I do if I receive case warnings?
- A: There are two types of case warnings—Non-Severe and Severe. You are responsible for researching non-severe case warnings and determining whether they can be cleared. If, after research, you believe that the non-Severe Case Warning(s) do not violate FHA program requirements. You must have applicable data in the file to support your decision; the loan can still be insured. Severe Case Warnings require you to submit the CB to the HOC for pre-insurance review.
- Q: What are Severe Case Warnings?
- A: There are three Severe Case Warnings:
 - (1) CAIVRS sanction,
 - (2) Social Security Number (SSN) data validation problem, and
 - (3) HOC indication of a potential risk to FHA presented by this loan.
- Q: Once I submit the CB with Severe Case Warning(s) to FHA for pre-endorsement review, how do I track its status?
- A: There are 3 ways to view the status of cases submitted to FHA:
 - (1) Using the *Case Query* Page. The *Case Query* Page has been modified to show the status of the submission of the CB and whether the endorsement was processed by the lender, the HOC, or has not been processed. Use this to check on a single CB.
 - (2) Using the new *Binder Selection* Page on FHAC's *Case Processing* Menu. This shows a list of CBs for cases you either originated or sponsored.
 - (3) Using the MIC/NOR List Page on FHAC's Case Processing Menu. This shows a list of cases endorsed or NOR'd.
- Q: Must I still submit required CBs in paper format?
- A: No, there is another option. You may submit requested CBs in electronic format. In order to submit an eCB, you prepare the electronic file according to FHA's eCB standards, which can be found in the Electronic Case Binder Developer's Guide at http://www.hud.gov/pub/chums/electronicCaseBinder.pdf. The list of



documents that are to be included in the eCB and the order in which they must be indexed is also included in the Developer's Guide.

However, if you've been approved for eCBs, you must always submit CBs in electronic format. If you are a paper LI lender, you must always submit CBs in paper format, until you have gone through the testing process and been approved by FHA for eCBs.

- Q: What is the process for non-LI lenders? Are CBs sent to the HOC for HOC staff to insure?
- A: There is no change to the current process.

Lender Loans Eligible for LI

- Q: Are there specific requirements about the time from loan closing to input in FHAC?
- A: No, but, if you go beyond 60 days, late endorsement processing becomes applicable.
- Q: Is the LI process different for late endorsements? Will there be less tolerance?
- A: The LI process does not handle late endorsements any differently than they are handled today, nor have grace periods changed.

Lender's Pre-insurance Review and Approval for Insurance

- Q: Must every file go through the "pre-insurance review" or just a percentage of loans?
- A: Every file <u>must</u> go through this review.
- Q: If principal loan balance reduction is required, how do lenders note this in FHAC?
- A: Based on the principal reduction, the lender will identify the reduced loan amount in FHAC and modify the P&I only if the system issues an error warning. Lenders should always enter the corrected loan amount based on the reduction. Based on the corrected loan amount, the system either will request a correction to the P&I or leave it alone. An enhancement to FHAC to make this easier in the future is planned.
- Q: Is the MCAW being eliminated?
- A: Yes we are moving to a loan transmittal form in the future. Implementation will be announced in a Mortgagee Letter.



- Q: Will a lender's staff member/processer be able to "LI" a file? Would s/he not be able to LI any files, or just the ones s/he had done work on?
- A: Anyone who served as the loan's originator, processor, or underwriter cannot insure the loan. If your responsibilities come under the origination function, whether you worked on that specific loan or not, you are not eligible to insure loans under the LI program.

LI Case Approval/Denial

- Q: Once the lender indicates that the loan is ready for endorsement, is approval received online, or is there a waiting period?
- A: Insurance approval is displayed immediately online. .
- Q: When FHA case numbers are initially ordered, many times the case number is on hold for SSN validation. They are reviewed and then cleared prior to the issuance of the case number. Will these cases receive a severe case warning during the insurance process?
- A: Only if it fails the validation. Any time the SSN data must be re-checked against the databases, this could result in an SSN failure and a severe case warning. (Adding an initial to a name or changing the date of birth are two actions that will result in a re-validation against the databases.)
- Q: How, unless FHA has the file, would it know if something is missing or not correct?
- A: It would not know unless the file is subsequently pulled for review. This is why it is critically important that lenders implement good quality control and preinsurance review processes.
- Q: If a mortgage record change is done in error will the loan still be insurable?
- A: The mortgage record change transaction can not take place until after the case is insured.
- Q: If a loan is ultimately determined not to be insurable, will all MIP funds collected be returned automatically or will the lender need to request it?
- A: Lenders need to follow the same process as they do today and request the MIP funds.
- Q: Does the HOC have a POC for MIC corrections?



A: Lenders can access the MIC Corrections form on HUD's Internet site at http://www.hud.gov/offices/hsg/sfh/ref/sfhp3-03.cfm. The completed form should be sent to the appropriate HOC for processing.

Making LI CB/eCB Requests

- Q: What is the timeframe in which lenders could be notified of a request for a CB?
- A: For Post-Endorsement Technical Reviews, the lender will know right away because a message will be displayed right after the loan is insured by the system. Appraisal Reviews can be performed up to one year following endorsement. Complaints and other types of requests can result in a CB request any time after endorsement up to several years late. QA reviews are performed up to 2 years after endorsement. These varying timeframes illustrate why it is so important that lenders comply with the CB retention requirements.
- Q: If a CB/eCB is not requested at the time of endorsement, how will the lender know if a CB/eCB has been selected? (If you do not access the other screens mentioned to check?) Is there a list that appears?
- A: Lenders must implement internal procedures to check the Case Binder Selection page in the FHA Connection on a daily basis. B2G lenders must also request the list of case numbers requested on a daily basis.
- Q: When an eCB is needed to address OIG or FOIA requests, complaints, hotline reports, or congressional inquiries, etc., how is it ordered from the lender since CBTS will not be used? How much time do the lenders have to respond to this type of CB request?
- A: As a future enhancement, a special screen will be designed where the CBs can be selected by reviewers. Their requests will appear on the Binder Selection page. Lenders will have the same 10 calendar days to respond.
- Q: What if staff need information from the borrower or attorneys and cannot get it in 10 calendar days?
- A: Processing and Underwriting Directors within the HOCs will be responsible for monitoring the lender's performance.

Responding to LI eCB/CB Requests

- Q: Are lenders to submit a minimum number of CBs within a specified timeframe?
- A: No.



- Q: Must lenders do something to indicate that the requested paper CB is an LI request?
- A: Yes, lenders should use yellow folders for LI cases.
- Q: Where do lenders get yellow CBs?
- A: These should be available from the same source providing the manila binders.
- Q: Are scanned files okay [for] audit? (2 years)
- A: Yes, as long as they are legible. Of particular concern are the photographs supporting the appraisal these must be clear.

Processing LI eCBs/CBs

- Q: Will a case warning show up on the *Case Logging* Page for LI CBs that are sent to the HOC? (Currently no case warnings appear.)
- A: Yes.
- Q: Is the HOC going to check to be sure the files are in proper order and there are good copies?
- A: For any CBs received by the HOCs, the normal process will be followed. This is a way of ensuring data quality.
- Q: Who/what determines if an eCB is "Not accepted"?
- A: This is a technology related process—if the system cannot open or read the eCB it is not acceptable.
- Q: Every CB sent to HUD for insuring today has at least one data entry error; most have several. What is going to be done to improve quality of the data? Quality is going to be hard to control.
- A: The PETR process now includes a data quality control check along with a new deficiency code. FHA will be identifying lenders with one or more deficiencies and following up with them to ask what they will be doing to resolve these findings. This is an evolving process.
- Q: If paper CB is rejected (NOR'd) will file be returned to lender?
- A: Yes. The NOR should be succinct and include the reason(s) why the CB is being returned and the contact information for the person who NOR'd the file.
- Q: Will the CB need to be re-submitted or can the problem be cleared if the lender sends/faxes the required documentation?



A: The entire CB must be re-submitted by the lender.

Tracking eCB/CB Status

- Q: Will lenders only receive binder status (accepted/requested) on HUD's Web site?
- A: With the exception of NORs when files are returned, all communication will be online via FHAC/B2G.
- Q: What does the tracking status, "Not Accepted" mean?
- A: This is a technology related status—if the system cannot open or read the eCB it is not acceptable.

After Loan is Insured by FHA

- Q: Should a lender's QA staff conduct a post-insurance review?
- A: No. The lender should just make sure that the quality control plan is modified to include a review of LI files.
- Q: Will FHA provide a post-closing checklist to lenders?
- A: No. If lenders follow the pre-insurance review checklist, conduct data quality reviews, and follow their normal quality review processes, they will be compliant with post-closing requirements.

Post Endorsement Technical Review

- Q: What percentage of cases can we expect to be selected for review?
- A: The same percentage as today: 6-7%.
- Q: How will LI cases be selected for PETR? (Random, Lender-focused, by the HOC?)
- A: FHA uses several methods to select. All of these processes are used. The current selection process remains the same regardless of whether the case is normal, LI-insured, or insured by the HOC.
- Q: Will lenders have extended access to FHAC during non-work hours? For example, later than 8 p.m. Mountain Standard Time and on Saturdays and Sundays?
- A: FHAC Access Hours will stay the same. The hours are: 8 a.m. 9 p.m. EST Monday through Saturday. The schedule and any modifications to it required by system maintenance are posted on the HUD Web Site.



Appraisal Reviews

- Q: When/how will a lender be notified when an ARR is required?
- A: For anything beyond a severe case warning or PETR, screens are being developed to accept requests for case binders.

Availability of LI Guidance

- Q: Could FHA provide more frequent training to lenders?
- A: FHA understands the need for additional training and is working on a solution. FHA's ultimate goal is to provide Web-based training to be available on demand.
- Q: Will there be direct tech support for lenders and a direct phone extension they can use?
- A: Lenders should contact the applicable HOC, whose staff should be able to assist them.
- Q: Lenders need a desk guide to show them what fields from the appraisal, MCAW, and note to enter into FHAC for insuring.
- A: FHA will include this as a future enhancement to the LI Guide.
- Q: Is there a contact number for IT help?
- A: Call 1-800-225-5343 to reach FHA's Call Center.